

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA**

(1) STRIKE, LLC

Plaintiff,

VS.

(1) SANDY CREEK FARMS, INC.,

(2) STEVE BARRINGTON,

(3) JOHN DOE #1,

(4) JOHN DOE #2,

(5) JOHN DOE #3, and

(6) JOHN DOE #4,

Defendants.

Case No. CIV-20-571-PRW

MOTION TO DISMISS BY SANDY CREEK FARMS, INC. AND STEVE BARRINGTON

I. OVERVIEW

Defendants Sandy Creek Farms, Inc., and Steve Barrington (collectively, Sandy Creek) by undersigned counsel, file this motion to dismiss the Complaint filed by Strike LLC for lack of subject matter jurisdiction under Fed. R. Civ. Pro. 12(b)(1) and for failure to state a claim under Fed.R. Civ. Pro. 12(b)(6). Regarding jurisdiction, Strike did not disclose the identities of several of its members, thereby precluding this court from finding diversity jurisdiction, a constitutional imperative under Article III. *Elna Sefcovic, LLC v. TEP Rocky Mountain, LLC*, No. 19-1121, at *9 n.6 (10th Cir. Mar. 18, 2020)(“The district court's diversity jurisdiction is a creature of federal law under Article III.”)

As to the merits, Strike's claim for tortious interference with contract fails. Strike cannot show that Sandy Creek's alleged actions were the proximate cause of its damages given that the Federal Energy Regulatory Commission (FERC) shut the project down for a month in July 2019 (*See* Exh. 1, FERC Shut Down Letter, July 3, 2019) due to over 200 non-compliance and problem

incidents unrelated to Sandy Creek. *See Niemeyer v. U.S. Fidelity and Guar. Co.*, 789 P.2d 1318, 1323 (Okla. 1990) (requiring a showing that the damage was proximately sustained as a result of the interference [with contract].”) In other words, any damages that Strike incurred under its contract with Midship were of its own doing and began adding up long before any of the actions alleged in Strike’s complaint. Argument follows.

II. STATEMENT OF RELEVANT FACTS

A. The Parties

Defendant Sandy Creek is incorporated under Oklahoma law and is a commercial farm in Grady County, Oklahoma. Sandy Creek features a complex irrigation system comprised of an intricate array of water lines, center-pivots and interlocking raised ponds. Defendant Steve Barrington and his brothers Randy and Kent Barrington inherited the farm from their father and currently operate it.

Because Sandy Creek is situated atop a water table in close proximity to freshwater supply and has a robust irrigation infrastructure in an otherwise arid state, the farm produces high quality equine hay with yields per acre that are four to five times greater than non-irrigated county averages. Or at least, this was so before Midship Pipeline Company LLC, pursuant to a certificate granted by the FERC, acquired possession of an easement across Sandy Creek by eminent domain to install a 2-mile segment of its 234-mile interstate natural gas pipeline which has prevented Sandy Creek from farming approximately 352 acres for nearly 18 months. *See Midship Pipeline Company LLC v. Tract No. CN-004*, 5:18-cv-0858, Doc. No. 613, February 9, 2019 (Order Granting Immediate Possession).

Plaintiff Strike is a limited liability company incorporated under the laws of Texas. Strike states that it has two private equity funds as members whose identities Strike has not disclosed.

Pursuant to its contract with Midship, Strike is responsible for construction of the northern spread of the Midship Pipeline, including the portion on Sandy Creek. The pipeline segment across Sandy Creek accounts for approximately 1.3 percent of the 153 miles of the Northern Spread. Defendants have acquired redacted construction contracts and believe the Midship construction contract imposes a warranty obligation on Strike that requires Strike to return and redo any work that does not satisfy applicable regulatory requirements.

B. Midship Pipeline Construction

Construction on the Midship Pipeline by Strike began sometime in March 2019, after FERC issued a notice to proceed.¹ Between May and June 2019, FERC tallied 62 non-compliance incidents against Midship (and by association, its contractor Strike) along the Northern Spread prompting a month-long shut down. *See* Ex. 1 (FERC Letter, July 3, 2019, Shut Down Letter). In December 2019, Cheniere, Midship's parent company reported that it would seek a rate increase to cover higher construction costs due to heavy rains.²

Meanwhile, Strike continued work on the pipeline. On the Sandy Creek property, Strike ruptured Sandy Creek's water line several times between November and May 2020, which in combination with heavy rains and natural groundwater, flooded the easement. *See Midship Pipeline Company LLC v. Tract CN 004*, 18-cv-0858, Doc. 698, 698-1 (Barrington Declaration denying allegations of interference with construction), 698-2 (Laps Declaration, same). In April 2020, FERC granted Midship's request to put the project in service, but found that numerous

¹ *See* Nasdaq Press Release (March 1, 2019), <https://www.nasdaq.com/press-release/cheniere-and-eig-complete-financing-and-issue-full-notice-proceed-midship-pipeline>.

² *See* Seeking Alpha, *See* <https://seekingalpha.com/news/3528299-cheniere-raises-midship-cost-estimate-sees-service-starting-in-april>

tracts (Sandy Creek as well as others) had not yet been restored and still required additional work.³

Notwithstanding that Strike's subpar construction prompted an unprecedented month-long FERC shut-down in July 2019, and required Midship (and Strike) to take additional steps to restore dozens of properties, not just Sandy Creek, Strike now blames Sandy Creek for its self-inflicted damages through a tortious interference claim. Strike's complaint fails.

III. ARGUMENT

A. Subject Matter Jurisdiction Cannot Be Established Without Disclosure of the Identities of Strike's Members.

We address procedural issues first. Strike asserts that this Court has diversity jurisdiction over its Complaint against Sandy Creek Farm. Sandy Creek and Mr. Barrington are Oklahoma citizens. As a limited liability company, Strike takes the citizenship of all of its members under this Circuit's precedent. *Siloam Springs Hotel, L.L.C. v. Century Sur. Co.*, 781 F.3d 1233, 1234 (10th Cir. 2015). Strike's members include private equity funds organized as limited partnerships, but the identities of the individual partners are purportedly confidential. Based on a Declaration of Counsel, Strike claims that these unidentified partners are citizens of twenty-four different states, exclusive of Oklahoma and as such, complete diversity exists between the parties.

Diversity jurisdiction is a constitutional imperative. *Gadlin v. Sybron Int'l Corp.*, 333 F.3d 797, 799 (10th Cir. 2000). Therefore, a federal court has an independent obligation to ensure that it does not exceed the scope of its Article III jurisdiction. *Amazon, Inc. v. Dirt Camp, Inc.*, 273 F.3d 1271, 1276 (10th Cir. 2001); *Citizens Concerned for Separation of Church & State v.*

³ See SPG GLocal, See <https://www.spglobal.com/marketintelligence/en/news-insights/latest-news-headlines/ferc-gives-midship-approval-to-start-service-citing-upcoming-restoration-58091661>

City & County of Denver, 628 F.2d 1289, 1301 (10th Cir. 1980). *St. Paul Fire & Marine Ins. Co. v. Future Energy Servs., LLC*, No. CIV-16-741-D, at *1 (W.D. Okla. Sep. 6, 2016). Because Strike did not disclose the identity of the individual partners, this Court cannot discharge its obligation to ascertain whether full diversity between parties exists. Nor can Sandy Creek challenge diversity without disclosure of the identity of the equity fund partners.

As the party invoking this Court's diversity jurisdiction, Strike bears the burden of proof. *Martin*, 251 F.3d at 1290, citing *Huffman v. Saul Holdings Ltd. P'ship*, 194 F.3d 1072, 1079 (10th Cir. 1999). Strike cannot demonstrate diversity jurisdiction without disclosing both the identity of all of its members and their respective citizenship. *See Am. Energy Permian Basin, LLC v. Ets Oilfield Servs., LP*, CIV-16-1024-R, at *3 (W.D. Okla. Dec. 19, 2016)(dismissing for lack of jurisdiction where identities of each LLC member were not provided); *Charter Oak Fire Ins. Co. v. Garage Condos of Okla., LLC*, Civil Action No. 20-cv-01605-RM-STV, at *2 (D. Colo. June 5, 2020)(finding diversity jurisdiction not shown where plaintiffs fail to allege the identity and citizenship of these LLC members).

That the identity of Strike's members is purportedly confidential does not excuse Strike from the burden of proving diversity jurisdiction. In *Watson v. XO Commc'ns Servs. LLC*, No. 2:17-cv-00156, at *6-7 (D. Utah Sep. 17, 2018), a limited liability company failed to affirmatively plead the identity and citizenship of its members, asserting confidentiality. The district court allowed the company to satisfy the pleading requirements by filing the alleged confidential information under seal but the company declined, leaving the court no choice but to dismiss the case finding that the company did not satisfy its burden of establishing diversity jurisdiction.

The same outcome governs here. This Court must require Strike to disclose the identities of its private equity fund members or dismiss the case under Rule 12(b)(1) for lack of jurisdiction.

B. Strike Failed to State a Claim Because It Cannot Prove That It Has a Valid Contract With Midship or That Sandy Creek's Actions Were the Proximate Cause of Damages.

In Oklahoma law, a tortious interference claim has four elements: "(1) the interference was with an existing contractual or business right; (2) such interference was malicious and wrongful; (3) the interference was neither justified, privileged nor excusable; and (4) the interference proximately caused damage." *Woska v. Health Care Serv. Corp.*, No. CIV-17-89-D, at *9-10 (W.D. Okla. Feb. 20, 2018), *citing Wilspec Techs., Inc. v. DunAn Holding Grp., Co.*, 2009 OK 12, ¶ 15, 204 P.3d 69, 74 (citing *Mac Adjustment, Inc. v. Prop. Loss Res. Bureau*, 1979 OK 41, ¶ 5, 595 P.2d 427, 428); *see also Tuffy's, Inc. v. City of Oklahoma City*, 2009 OK 4, ¶ 14, 212 P.3d 1158, 1165.

1. Sandy Creek was unaware of the Strike-Midship Contract

To be subject to liability for tortious interference, "the actor must have knowledge of the contract with which he is interfering and of the fact that he is interfering with the performance of the contract." Restatement (Second) Torts § 766, comment (1977) (emphasis added). ” *Architects Collective v. Gardner Tanenbaum Group*, No. CIV-08-1354-D, at *6 (W.D. Okla. July 6, 2010). Here, Sandy Creek was generally aware of Strike's contract with Midship but did not know that its alleged conduct interfered with that contract. *Id* at *7 (dismissing tortious interference complaint where “Plaintiff has failed to plead *facts* showing that Benham knew its conduct would interfere with Gardner's contractual obligations.”)

Sandy Creek has repeatedly denied interfering with Midship's easement, both at a recently conducted hearing on September 8, 2020 and prior to that, by declaration. *See Midship Pipeline LLC*, 18-cv-00858 ECF Doc. No. 698 and attachments (denying interference). But even if Sandy Creek had flooded the easement (which it denies), Sandy Creek could not know that would

interfere with Strike's performance of the contract. Ultimately, Midship, not Strike holds the certificate and is responsible for restoration of the easement in accordance with FERC requirements. Although Sandy Creek might have known that flooding would delay or increase the cost of Midship's compliance with FERC requirements, how could it have known that Midship would pass its compliance obligations on to Strike under the contract. Because Sandy Creek could not have known that its actions interfered with Strike's contract with Midship and Strike has not alleged otherwise, the Complaint must be dismissed.

2. Sandy Creek did not act maliciously

"[C]onclusory allegations without supporting factual averments are insufficient to state a claim upon which relief can be based." Hall v. Bellmon, 935 F.2d 1106, 1109-10 (10th Cir. 1991)." *Taverna v. First Wave, Inc.*, No. 10-CV-129-CVE-FHM, at *3 (N.D. Okla. July 22, 2010). Here, Strike alleged in conclusory fashion that Sandy Creek's interference was "intentional and malicious." Strike Complaint at ¶42. "Malice...requires "an unreasonable and wrongful act done intentionally, without just cause or excuse," and it "requires a showing of bad faith." *Hankins v. Welch State Bank*, No. 14-CV-0398-CVE-PJC, 2014 WL 5472753, at *5 (N.D. Okla. Oct. 28, 2014) " *Jackson v. Bd. of Cnty. Comm'rs of Mayes Cnty.*, No. 15-CV-53-TCK-FHM, at *17 (N.D. Okla. Mar. 10, 2017). There is nothing in the Complaint to suggest that Sandy Creek committed an unreasonable act in bad faith. When Sandy Creek's water line was ruptured by Strike in the November and December time frame and Sandy Creek could not shut the valve, water flowed into the easement and there was nothing Sandy Creek could do to stop it. As for breaching the berms, Sandy Creek again denies having done so, and even if it had, the breach would not have caused the flooding that Strike claims.

Strike suggests that Sandy Creek's actions were motivated by "an unlawful attempt to extort more money out of Midship and Strike." Yet Strike never explains how interference with its contract with Midship would enable Sandy Creek to extort more money from Strike when Midship, not Strike has an obligation to repair the property and pay the landowners. Without any factual evidence regarding malice, Strike's Complaint must fail.

3. No causation of damages

Finally, Strike cannot show that the actions alleged caused any increased damages. Sandy Creek is just one of numerous properties along the Northern Spread of the pipeline. By July 2019, FERC shut the project down due to repeated violations - presumably by Strike which was performing the construction. *See* Exh. 1. Moreover, the month-long delay in July -- traditionally one of the driest months -- pushed the project even further behind.

The construction problems continued well into 2020. As of August 2020, FERC found 459 problem incidents or non-compliances along the Northern Spread that must be addressed. *See* Exh. 2. All of these noncompliance issues cumulatively account for Strike's increased construction costs, not just the problems on the Sandy Creek property. Because Strike cannot demonstrate that its alleged increased costs were due to Sandy Creek's alleged conduct and not Strike's incompetence in construction of the entire pipeline, Strike fails to state a claim upon which relief can be granted.

IV. CONCLUSION

Wherefore, for the foregoing reasons, Sandy Creek and Mr. Barrington move this Court to dismiss Strike's Complaint under Fed.R. Civ. Pro. 12(b)(1) for want of jurisdiction and under Fed. R. Civ. Pro. 12(b)(6) for failure to state a claim.

Respectfully submitted,

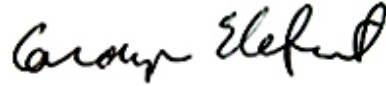
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CERTIFICATE OF SERVICE

I, Carolyn Elefant, certify that on this 14th day of September 2020 I caused the foregoing Notice of Deposition to be served by electronic mail on parties to the case.



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Exhibit 1

FERC Shut-Down Letter Dated July 3, 2019

FEDERAL ENERGY REGULATORY COMMISSION
WASHINGTON, D.C. 20426

OFFICE OF ENERGY PROJECTS

In Reply Refer To:
OEP/DG2E/Gas 1
Midship Pipeline Company, LLC
Midcontinent Supply Header Interstate
Pipeline Project
Docket No. CP17-458-000

July 3, 2019

Ms. Karri Mahmoud
Manager, Regulatory Affairs
Midship Pipeline Company, LLC
700 Milam Street, Suite 1900
Houston, TX 77002

Re: MIDSHIP Project North Spread Non-compliances

Dear Ms. Mahmoud:

Based on my staff's recent compliance inspection during the week of June 17, 2019, consultation with our Third-Party Compliance Monitors (Compliance Monitors), and review of Midship Pipeline Company, LLC's (Midship) weekly construction reports, I have significant concerns with Midship's environmental compliance on the North Spread of the Midcontinent Supply Header Interstate Pipeline Project (Project). The North Spread consists of Mileposts (MP) 0.0-119.0, the 20.5-mile-long Chisholm Lateral, and the 13.8-mile-long Velma Lateral across Kingfisher, Canadian, Grady, Stephens, Carter and Garvin Counties, Oklahoma. Along the North Spread, Midship has failed to comply with the environmental conditions of the Commission's August 13, 2018 Order issuing Certificate for the Project, as detailed below. Further, Midship has not acted timely in bringing the North Spread project areas back into compliance at locations where non-compliance reports were issued by both the Compliance Monitors and Midship's Environmental Inspectors.

Between May 30 and June 30, the Commission's Compliance Monitors documented 62 non-compliances on the North Spread, of which 17 non-compliances remain unresolved. The types of non-compliances detailed below cannot continue. Further, I am particularly concerned that Midship has continued to clear and grade additional right-of-way on the North Spread without resolving the ongoing compliance concerns raised by my staff and the Compliance Monitors. Therefore, to ensure that environmental compliance on active portions of the North Spread is regained before new sections of the right-of-way are disturbed, I am requiring **Midship to immediately stop**

work on the remaining segments of the North Spread between MPs 66 and 119 (including the Velma Lateral) where clearing and grading have not occurred.

Furthermore, **within seven days of the date of this letter**, Midship must provide evidence of corrective action for all unresolved non-compliance incidents. In addition, Midship **must** provide a detailed plan for restoring the upper 12 inches of topsoil to pre-construction levels and grade due to the high loss of topsoil from erosion and mixing with subsoil at numerous identified locations on the North Spread. I am requiring these actions under the provisions of condition 2 of the Commission's Order and due to the circumstances described below.

Along the North Spread, Midship has failed to demonstrate compliance with required mitigation measures for protecting resources outlined in the FERC *Upland Erosion Control, Revegetation, and Maintenance* (Plan) and *Wetland and Waterbody Construction and Mitigation Procedures* (Procedures). During a compliance inspection the week of April 29, 2019, and during a conference call on June 3, 2019, my staff raised compliance concerns with Midship's management regarding the North Spread after issuance of numerous non-compliance reports following several significant rain events in April and May 2019. At that time, Midship's management committed to resolve the non-compliances in a timely manner, increase environmental crews from 5 to 13 crews to improve the installation and maintenance of erosion control devices, and increase the number of Environmental Inspectors along this spread. Since those discussions, and despite weather improvements since May 2019, my staff has seen an additional decline in the level of compliance along the North Spread, including a number of unresolved non-compliance locations where Midship's crews have failed to address the identified non-compliance locations since May 2019, inadequately repaired affected resources, or failed to install sufficient erosion controls.

Documentation in Midship's and our Compliance Monitors' weekly reports has shown multiple areas of new and repeated noncompliance areas, such as lack of erosion control maintenance, improper installation of erosion control devices, sediment eroding into wetlands and waterbodies, loss of topsoil due to erosion and inadequate stabilization after disturbance, topsoil and subsoil mixing, failing to adequately stabilize waterbody banks, and generally failing to address problem areas and non-compliances timely, or in some cases, at all. In regards to proper topsoil stabilization, which is required by Sections IV.B.4 and IV.B.6 of FERC's Plan, our Compliance Monitors estimated that between MP 0.0 and 30.0, Midship's crews have failed to adequately stabilize approximately 25 percent of the segregated topsoil. Additionally, between MPs 30.3 and 33.3, MPs 34.5 and 34.7, MPs 35.2 and 47.5, and 48.6 and 65.0, Midship's crews have failed to implement any topsoil stabilization measures. Between May 30, 2019 and June 30, 2019, a total of 27 non-compliances were written by the Commission's Compliance Monitors for topsoil erosion and the mixing of topsoil and subsoil. Six of those non-compliances were written in repeat locations.

Docket No. CP17-458-000

3

On the North Spread, eight waterbody locations have received repeated problem area or non-compliance reports. The reports document sediment entering the waterbody from the right-of-way, project-related bank erosion, inadequate erosion control device installation/maintenance, inadequate signage marking wetland and waterbody boundaries, and equipment parked overnight within 100 feet of a wetland or waterbody without proper secondary containment, which are violations of Sections II.B.2 and IV.F.3 of the FERC Plan and IV.A.1.d and VI.A.4 of the FERC Procedures. Additionally, due to the rain events during April and May 2019, several locations were documented where equipment construction mats had floated off the right-of-way. The Compliance Monitors have documented at least nine accessible locations where Midship's construction mats have remained for over a month without being retrieved.

Only after Midship resolves the documented non-compliance incidents and regains environmental compliance on the North Spread, will staff consider re-issuing a notice to proceed for the segments of the right-of-way between MPs 66 and 119 where clearing and grading activities have not occurred.

If you have any questions, please contact Elaine Baum, environmental project manager, at (202) 502-6467 or Danny Laffoon, Gas Branch 1 Chief, at (202) 502-6257

Sincerely,



Terry L. Turpin
Director
Office of Energy Projects

Document Content(s)

CP17-458-000 North Spread Letter.PDF1

Exhibit 2

Construction Violation Totals and Log
January 27, 2019 to August 29, 2020.



**FEDERAL ENERGY REGULATORY COMMISSION
ENVIRONMENTAL COMPLIANCE MONITORING PROGRAM
WEEKLY SUMMARY REPORT**

**MIDCONTINENT SUPPLY HEADER INTERSTATE PIPELINE PROJECT
DOCKET NO.: CP17-458-000
FOR THE PERIOD: AUGUST 23 THROUGH 29, 2020**

On August 13, 2018, the Federal Energy Regulatory Commission (FERC) issued a Certificate of Public Convenience and Necessity (Certificate) under Section 7 of the Natural Gas Act for authorization to construct and operate Midship Pipeline Company, LLC's (Midship) Midcontinent Supply Header Interstate Pipeline Project (Midship Project). On April 16, 2020, FERC staff approved in-service of the Midship Project.

As committed to in the Midship Project Implementation Plan and in accordance with the Certificate for the above referenced docket, Midship agreed to fund an Environmental Compliance Monitoring Program during construction of the Midship Project. This report provides a summary of the FERC Compliance Monitor's construction review for this reporting period.

The Compliance Monitor is responsible for reviewing Midship's construction and documenting compliance with the FERC Certificate.

During this reporting period, the Compliance Monitoring Team issued twenty compliance monitoring reports consisting of seven acceptable reports, eight communication reports, and five problem area reports. No noncompliance or serious violation reports were issued during this reporting period. No Level 1 or Level 2 variance requests were approved during the reporting period. A tabular summary of the compliance monitoring reports is presented below.

**SUMMARY OF COMPLIANCE MONITOR REPORTS AND APPROVED VARIANCES FOR THE
MIDSHIP PROJECT**

Compliance Level	Number of Reports This Reporting Period	Cumulative Number of Reports
Acceptable	7	2,337
Communication	8	1,126
Problem Area	5	349
Noncompliance	0	211
Serious Violation	0	0
Approved Level 1 Variances	0	56
Approved Level 2 Variances	0	90
Total Reports	20	4,169

560 total violations on Midship Project

North Spread: 459

South Spread: 101

**PROBLEM AREA REPORTS**

Problem area reports record an observation where an area or activity does not meet the definition of acceptable but is not considered a noncompliance. Five problem area reports were issued by the Compliance Monitor during this period, as detailed below.

SUMMARY OF PROBLEM AREA REPORTS FOR THE MIDSHIP PROJECT				
Report Number	Date Issued	Location (Spread or Facility/ MP/ County)	Follow-up Required (Yes or No)	Problem Area Description
EV-7694	8/26/2020	Mainline / North Spread / MP 106.40 to 106.70 / Carter County	Yes	In response to a landowner concern filed on the FERC Docket on 08/24/2020, the Compliance Monitor inspected tract CR-0514.010. The landowner concerns included rock, debris, revegetation issues, and subsidence issues. The Compliance Monitor did not observe rock or debris during the inspection. The Compliance Monitor noted that revegetation was limited; however, no erosion was observed and the right-of-way was stable. The Compliance Monitor noted an area of trench line subsidence approximately 100 feet long near the west property line. The Compliance Monitor and the Midship Lead EI discussed the issues. The Midship Lead EI stated that the subsidence issue would be communicated to Midship and contractor management for mitigation.
EV-7697	8/27/2020	Mainline / North Spread / MP 95.70 to 96.30 / Garvin County	Yes	In response to a landowner concern filed on the FERC Docket on 08/24/2020, the Compliance Monitor inspected tracts GA-0444.000, GA-0445.000, GA-0446.000, and GA-0448.000. The landowner concerns included topsoil loss, erosion, subsidence, contour restoration, debris, and vegetation concerns. The Compliance Monitor noted that erosion was present on tract GA-0448.000. The Compliance Monitor also noted a small amount of debris and some areas of unsuccessful revegetation on the tracts. The Compliance Monitor noted that the banks of the waterbody were stable and vegetated. The Compliance Monitor did not note any topsoil loss on any of the tracts. The Compliance Monitor observed that surface contours appeared to indicate that stormwater ponding might occur, however, due to several weeks with no precipitation, ponding was not evident. The Compliance Monitor and the Midship Lead EI discussed the observations and noted issues and discussed the possibility that deep soil decompaction might alleviate possible future ponding occurrences. The Midship Lead EI stated that the issues would be communicated to Midship and contractor management for mitigation.



Midcontinent Supply Header Interstate Pipeline Project, Docket No.: CP17-458-000
 Environmental Compliance Monitoring Program
 August 23 through 29, 2020 Summary Report

SUMMARY OF PROBLEM AREA REPORTS FOR THE MIDSHIP PROJECT				
Report Number	Date Issued	Location (Spread or Facility/ MP/ County)	Follow-up Required (Yes or No)	Problem Area Description
EV-7700	8/28/2020	Chisholm Lateral/ North Spread / MP 18.80 to 19.30 / Kingfisher County	Yes	In response to a landowner concern filed on the FERC Docket on 08/24/2020, the Compliance Monitor inspected tract CL-KI-0077.000. The landowner concerns included subsidence, inadequate contour restoration and compaction. The Compliance Monitor noted that trench line subsidence was present in the cultivated agricultural field and one of the terrace crossings also appeared to have subsided. The pasture area was vegetated and the Compliance Monitor did not observe any erosion. The Compliance Monitor and the Midship Lead EI discussed the observations and noted issues. The Midship Lead EI stated that the issues would be communicated to Midship and contractor management for mitigation. The Midship Lead EI also stated that compaction measurements would be obtained for the tract.
EV-7702	8/28/2020	Mainline / North Spread / MP 2.10 to 2.80 / Canadian County	Yes	In response to a landowner concern filed on the FERC Docket on 08/24/2020, the Compliance Monitor inspected tracts CN-0007.010 and CN-0011.000. The landowner concerns included erosion, subsidence and vegetation concerns. The Compliance Monitor noted that erosion was present at three locations and subsidence was present at two locations. The Compliance Monitor also observed that vegetation was present in varying degrees from near 100 percent revegetation to approximately 25 percent revegetation. The Compliance Monitor and the Midship Lead EI discussed the observations and noted issues. The Midship Lead EI stated that the issues would be communicated to Midship and contractor management for mitigation.
EV-7704	08/28/2020	Mainline / North Spread / Problem Area / MP 8.70 to 9.30 / Canadian County	Yes	In response to a landowner concern filed on the FERC Docket on 08/24/2020, the Compliance Monitor inspected tracts CN-0038.010 and CN-0039.000. The landowner concerns included inadequate contour restoration and vegetation concerns. The Compliance Monitor noted signs of stormwater ponding with reduced vegetation in some areas. The Compliance Monitor and the Midship Lead EI discussed the observations and noted issues. The Midship Lead EI stated that the issues would be communicated to Midship and contractor management for mitigation.



PROBLEM AREA REPORTS

Problem area reports record an observation where an area or activity does not meet the definition of acceptable but is not considered a noncompliance. Two problem area reports were issued by the Compliance Monitor during this period, as detailed below.

SUMMARY OF PROBLEM AREA REPORTS FOR THE MIDSHIP PROJECT				
Report Number	Date Issued	Location (Spread or Facility/ MP/ County)	Follow-up Required (Yes or No)	Problem Area Description
EV-7678	8/19/2020	Mainline / North Spread / MP 34.9 to 35.7 / Grady County	Yes	The Compliance Monitor inspected tracts GR-0133.010 and GR-0134.010 following the receipt of a landowner concern and noted that the subsurface drain tiles did not appear to be functioning. Repair of the drainage tile was previously documented in EV-7596 issued on 7/2/2020. The Compliance Monitor noted that surface drainage was present on tract GR-0134.010 along the path of the previously restored drain tile. During the previous inspection, the drain tile had been flowing with subsurface drainage. No flows were noted during the current inspection. The Compliance Monitor also noted that construction debris was present on both tracts. The Compliance Monitor informed the Midship Lead EI of the observed issues. The Lead EI stated that the construction debris would be removed from the tracts. The Compliance Monitor and the Midship Lead EI also discussed the damaged drain tiles. The Compliance Monitor requested that the Midship Lead EI provide pre-construction images of the drain tile areas to determine if the tiles were functional prior to construction. Per the FERC Plan, Section 4.C.3., damaged drain tiles are to be repaired to their original or better condition. Qualified specialists should be used for testing and repairs of drain tiles. Midship had not yet determined a plan for the drain tile issue.



Midcontinent Supply Header Interstate Pipeline Project, Docket No.: CP17-458-000
 Environmental Compliance Monitoring Program
 August 16 through 22, 2020 Summary Report

SUMMARY OF PROBLEM AREA REPORTS FOR THE MIDSHIP PROJECT

Report Number	Date Issued	Location (Spread or Facility/ MP/ County)	Follow-up Required (Yes or No)	Problem Area Description
EV-7686	8/22/2020	Mainline / North Spread / MP 70.5 to 72.3 / Grady County	Yes	The Compliance Monitor inspected tracts GR-0336.00, GR-0338.000 and GR-0340.000 following the submittal of a landowner representative concern on the FERC docket on 08/21/2020. The Compliance Monitor noted that the landowner and/or landowner representatives had excavated the irrigation water line area and eleven other locations on the right-of-way. Debris, including timber mat wood pieces and rock, were unearthed during the excavations. Per the FERC Plan, Section V.A.6., construction debris should be removed from all construction work areas unless the landowner approves leaving the materials onsite for beneficial reuse, stabilization, or habitat restoration. The Compliance Monitor and the Lead EI discussed the debris found on the tract. The Lead EI stated that Midship had been informed of the recently excavated debris and had not yet determined a mitigation plan. The Compliance Monitor noted that tract GR-0336.000 and the associated waterbody banks were stable with approximately 75 percent vegetation coverage. Tract GR-0340.000, which included a cultivated agricultural field and rangeland slope area, was stable. The Compliance Monitor noted that the northern portion of tract GR-0338.000 was stable, had a vegetation coverage of approximately 75 percent, and some saturated soil areas. The southern portion of tract GR-0338.000 was seeded later in the season and vegetation coverage was less than 25 percent.



PROBLEM AREA REPORTS

Problem area reports record an observation where an area or activity does not meet the definition of acceptable but is not considered a noncompliance. One problem area report was issued by the Compliance Monitor during this period, as detailed below.

SUMMARY OF PROBLEM AREA REPORTS FOR THE MIDSHIP PROJECT				
Report Number	Date Issued	Location (Spread or Facility/ MP/ County)	Follow-up Required (Yes or No)	Problem Area Description
EV-7634	7/24/2020	Mainline / North Spread / MP 70.50 to 72.60 / Grady County	Yes	The Compliance Monitor inspected the previously restored tracts GR-0336.000 and GR-0340.010. The Compliance Monitor noted erosion that needed to be mitigated (tract GR-0340.010) and construction debris that needed to be removed (GR-0336.000). No sensitive resources were at risk from the erosion. The Compliance Monitor and the Midship Lead EI discussed the issues, and the Lead EI stated that the issues would be addressed by the contractor during the punch list mitigation activities.



View of erosion issues on tract GR-0336.000, North Spread, MP 70.9. The Compliance Monitor issued a problem area report (see EV-7634 issued on 7/24/2020).



PROBLEM AREA REPORTS

Problem area reports record an observation where an area or activity does not meet the definition of acceptable but is not considered a noncompliance. One problem area report was issued by the Compliance Monitor during this period, as detailed below.

SUMMARY OF PROBLEM AREA REPORTS FOR THE MIDSHIP PROJECT				
Report Number	Date Issued	Location (Spread or Facility/ MP/ County)	Follow-up Required (Yes or No)	Problem Area Description
EV-7609	7/13/2020	Mainline / North Spread / MP 65.1 to 66.2 / Grady County	Yes	The Compliance Monitor inspected tracts GR-0310.000 and GR-0312.010 in response to a landowner/landowner representative complaint filed with the FERC on 7/6/2020. The Compliance Monitor noted that preconstruction contours had not been restored, ponding, possibly associated with trench line subsidence was present, and the rangeland/pasture area was sparsely vegetated with perennial grass and weeds. The Compliance Monitor also noted that the cultivated agricultural areas appeared to be impacted by either inadequate topsoil restoration or soil compaction issues based on reduced crop vigor compared to the adjacent off right-of-way areas. The Lead EI stated that additional restoration activities and issue mitigation is planned for the tracts, however, a specific time frame was not provided.



PROBLEM AREA REPORTS

Problem area reports record an observation where an area or activity does not meet the definition of acceptable but is not considered a noncompliance. One problem area report was issued by the Compliance Monitor during this period, as detailed below.

SUMMARY OF PROBLEM AREA REPORTS FOR THE MIDSHIP PROJECT				
Report Number	Date Issued	Location (Spread or Facility/ MP/ County)	Follow-up Required (Yes or No)	Problem Area Description
EV-7606	7/09/2020	Mainline / North Spread / MP 27.3 to 29.3 / Canadian and Grady Counties	Yes	The Compliance Monitor inspected tract GR-0110.010 in response to a landowner/landowner representative complaint filed with the FERC on 7/6/2020 and noted construction debris on the tract, subsidence in several areas, and evidence of subsoil present on the restored topsoil near the HDD workspace. The Compliance Monitor also noted construction debris on tracts CN-0107.010 and CN-0107.020 and ponding on tract CN-0107.010. The presence of construction debris on the restored right-of-way is out of compliance with the FERC Plan, Section V.A.6. The Compliance Monitor also observed subsidence, associated stormwater ponding, and erosion on tract GR-0110.020. The Compliance Monitor discussed the observations and issues with the Lead EI. The Lead EI stated that the contractor had planned to return to the area to address the subsidence issues, and that the construction debris issues would be addressed at that time.



View of construction debris left on the right-of-way after restoration activities, North Spread, MP 28.8. The Compliance Monitor issued a problem area report to document the issue (see EV-7606 issued on 7/09/2020).



PROBLEM AREA REPORTS

Problem area reports record an observation where an area or activity does not meet the definition of acceptable but is not considered a noncompliance. One problem area report was issued by the Compliance Monitor during this period, as detailed below.

SUMMARY OF PROBLEM AREA REPORTS FOR THE MIDSHIP PROJECT				
Report Number	Date Issued	Location (Spread or Facility/ MP/ County)	Follow-up Required (Yes or No)	Problem Area Description
EV-7589	6/29/2020	Mainline / South Spread / MP 156.6 to 157.8 / Johnston County	Yes	The Compliance Monitor noted that the erosion areas, previously identified in noncompliance report EV-7582 issued on 06/24/2020, had been hand raked, broadcast seeded and mulched, but that mulch had not been applied in all erosion areas, as required by the FERC Plan, Section IV.F.4.a. The lack of mulch in this area was previously documented in problem area report EV-7542 issued on 06/02/2020. The Compliance Monitor also noted that where applied, the mulch had not been crimp anchored as required by the FERC Plan, Section IV. F. 4.f. The Compliance Monitor discussed the issues with the Lead EI, to be addressed with the contractor.



View of mulch not anchored as required, South Spread, MP 157.7. The Compliance Monitor issued a problem area report to document the reoccurring issue (see EV-7589 issued on 6/29/2020).



NONCOMPLIANCE REPORTS

Noncompliance reports record an observation where an area or activity violates (is not in compliance with) the project specifications, results in damage to resources, or places sensitive resources at unnecessary risk. One noncompliance report was issued by the Compliance Monitor and/or compliance management team during this period, as detailed below.

SUMMARY OF NONCOMPLIANCE REPORTS FOR THE MIDSHIP PROJECT				
Report Number	Date Issued	Location (Spread or Facility/ Milepost [MP]/ County)	Follow-up Required (Yes or No)	Noncompliance Description
EV-7593	7/01/2020	Mainline / South Spread / MP 169.7 to 169.7 / Johnston County	Yes	The Compliance Monitor noted that the equipment being used by the contractor for restoration activities had been parked approximately 15 feet off the right-of-way, out of compliance with the FERC Plan, Section IV.A.1. The Compliance Monitor and the Lead EI discussed the issue and the Lead EI stated that she would address the issue with the contractor.



View equipment parked off the right-of-way, South Spread, MP 169.7. The Compliance Monitor issued a noncompliance report (see EV-7593 issued on 7/01/2020).



NONCOMPLIANCE REPORTS

Noncompliance reports record an observation where an area or activity violates (is not in compliance with) the project specifications, results in damage to resources, or places sensitive resources at unnecessary risk. One noncompliance report was issued by the Compliance Monitor and/or compliance management team during this period, as detailed below.

SUMMARY OF NONCOMPLIANCE REPORTS FOR THE MIDSHIP PROJECT				
Report Number	Date Issued	Location (Spread or Facility/ Milepost [MP]/ County)	Follow-up Required (Yes or No)	Noncompliance Description
EV-7582	6/24/2020	Mainline / South Spread / MP 156.50 to 158.0 / Johnston County	Yes	The Compliance Monitor inspected the right-of-way after the recent precipitation events, and noted the occurrence of erosion which was contained on the right-of-way. The stormwater borne sediment also overtopped slope breakers in several areas. As documented in a Problem Area Report (EV-7542 issued on 6/02/2020), the restoration crew did not mulch the re-graded right-of-way areas following drill seeding as required by the FERC Plan, Section IV.F.4.a. Emergent vegetation was insufficient to prevent erosion on sloping areas. The Compliance Monitor informed the Lead EI of the issues. The Lead EI stated that the erosion problems would be communicated to the contractor for mitigation.



View of erosion on a seeded, un-mulched slope after rainfall, South Spread, MP 157.2



PROBLEM AREA REPORTS

Problem area reports record an observation where an area or activity does not meet the definition of acceptable but is not considered a noncompliance. Three problem area reports were issued by the Compliance Monitor during this period, as detailed below.

SUMMARY OF PROBLEM AREA REPORTS FOR THE MIDSHIP PROJECT				
Report Number	Date Issued	Location (Spread or Facility/ MP/ County)	Follow-up Required (Yes or No)	Problem Area Description
EV-7542	6/02/2020	Mainline / South Spread / MP 156.0 to 158.0 / Johnston County	Yes	The Compliance Monitor noted that an area had been seeded, but not mulched, after the completion of erosion mitigation grading activities. The temporary bridges over the nearby waterbodies had been removed and the contractor had demobilized from the immediate vicinity. The Compliance Monitor discussed the observation with the environmental inspection team, who subsequently relayed that information to the contractor. The Compliance Monitor was informed that the contractor was not planning to apply any mulch. The Compliance Monitor reminded the environmental inspection team that mulch is to be applied to all slopes at the time of seeding or immediately after seeding, to stabilize the soil surface and to reduce wind and water erosion, as per the FERC Plan, Section IV.F.4.a. The Compliance Monitor informed the environmental inspection team of the issuance of a problem area report to document this, and noted that the area was stable, no precipitation was in the forecast, and that the area would be monitored during future precipitation events.
EV-7549	6/04/2020	Mainline / South Spread / MP 136.0 to 136.3 / Carter County	Yes	The Compliance Monitor inspected tract CR-0711.000 in response to a landowner complaint. The Compliance Monitor noted that construction debris, including wood and rock, were present on the tract, and therefore out of compliance with FERC Plan, Section V.A.4. and 6. The compliance Monitor also noted limited revegetation and areas where water was ponding on the right-of-way. The Compliance Monitor and the Lead EI discussed the issues.
EV-7550 (Continued on next page)	6/04/2020	Mainline / North Spread / MP 106.7 to 106.8 / Carter County	Yes	The Compliance Monitor inspected tract CR-0514.010 in response to the submittal of a landowner complaint to FERC. The landowner representative stated concerns regarding soil compaction, failure to segregate topsoil during construction, topsoil loss, rocks and debris left on the right-of-way, unstable waterbody banks, erosion issues, and unsuccessful revegetation. The Compliance Monitor contacted the landowner to discuss the concerns. The Lead EI informed the Compliance Monitor that soil compaction measurements had not been conducted on the tract. Topsoil segregation and restoration activities were previously documented as being in compliance (EV-6702 issued on 12/09/2020). The Compliance Monitor noted rock on the right-of-way, which is out of compliance with the FERC Plan, Section V.A.4. The Lead EI stated the issue would be addressed with the contractor.



Midcontinent Supply Header Interstate Pipeline Project, Docket No.: CP17-458-000
 Environmental Compliance Monitoring Program
 May 31 through June 6, 2020 Summary Report

SUMMARY OF PROBLEM AREA REPORTS FOR THE MIDSHIP PROJECT

Report Number	Date Issued	Location (Spread or Facility/ MP/ County)	Follow-up Required (Yes or No)	Problem Area Description
EV-7550 (Continued from previous page)	6/04/2020	Mainline / North Spread / MP 106.7 to 106.8 / Carter County	Yes	The Compliance Monitor noted that the waterbody banks were stable, well vegetated and the flow of water was not impeded. A problem area report (EV-6479 issued on 11/12/2019), was issued for ditch line subsidence on the waterbody banks. The bank ditch line subsidence was repaired and not noted in subsequent reports. The Compliance Monitor did not observe any erosion issues during the latest inspection, but ditch line subsidence was observed in an upland area. The Compliance Monitor informed the Lead EI of the subsidence and the issue was added to Midship's the punch list for repair. Prior inspections of the area indicated that available topsoil was segregated during construction on this tract (documented in EV-4884 issued on 9/15/2019) and segregated topsoil was replaced on the tract (documented in EV-6702 issued on 12/09/2020). The Compliance Monitor observed varying degrees of revegetation success, and the Lead EI stated that the issue would also be added to the punch list to be addressed to be addressed by the contractor. The Lead EI subsequently informed the Compliance Monitor that decompaction testing would be conducted on the tract.



View of sloping portion of the right-of-way seeded but without mulch, South Spread, MP 156.5 (EV-7542 issued on 6/02/2020)



PROBLEM AREA REPORTS

Problem area reports record an observation where an area or activity does not meet the definition of acceptable but is not considered a noncompliance. One problem area report was issued by the Compliance Monitors during this period, as detailed below.

SUMMARY OF PROBLEM AREA REPORTS FOR THE MIDSHIP PROJECT				
Report Number	Date Issued	Location (Spread or Facility/ MP/ County)	Follow-up Required (Yes or No)	Problem Area Description
EV-7457	4/24/2020	Mainline / North Spread / MP 84.50 to 85.80 / Garvin and Stephens Counties	Yes	The Compliance Monitor noted that sediment originating from the right-of-way was deposited approximately 200 feet off the right-of-way in the highway bar ditch during the recent rainfall event. The sediment did not reach any sensitive resources. The Compliance Monitor discussed the issue with the EI. The EI stated that he would inform the contractor of the off right-of-way sediment.



View of sediment off the right-of-way, North Spread, MP 85.60 (see EV-7457 issued on 4/24/2020).



PROBLEM AREA REPORTS

Problem area reports record an observation where an area or activity does not meet the definition of acceptable but is not considered a noncompliance. One problem area report was issued by the Compliance Monitors during this period, as detailed below.

SUMMARY OF PROBLEM AREA REPORTS FOR THE MIDSHIP PROJECT				
Report Number	Date Issued	Location (Spread or Facility/ MP/ County)	Follow-up Required (Yes or No)	Problem Area Description
EV-7424	4/16/2020	Mainline / North Spread / MP 59.02 to 59.69 / Grady County	Yes	The Compliance Monitor documented further erosion issues on the north bank of a waterbody on tract GR-0285.010 where erosion issues had been documented the previous week. The Compliance Monitor, Environmental Inspector, and Environmental Coordinator discussed temporary stabilization measures pending more permanent bank repairs scheduled for the following week.



View of waterbody bank erosion, North Spread, MP 59.67(see EV-7424 issued on 4/16/2020)



PROBLEM AREA REPORTS

Problem area reports record an observation where an area or activity does not meet the definition of acceptable but is not considered a noncompliance. Two problem area reports were issued by the Compliance Monitors during this period, as detailed below.

SUMMARY OF PROBLEM AREA REPORTS FOR THE MIDSHIP PROJECT				
Report Number	Date Issued	Location (Spread or Facility/ MP/ County)	Follow-up Required (Yes or No)	Problem Area Description
EV-7384	4/06/2020	Mainline / South Spread / MP 184.50 to 199.00 / Bryan County	Yes	The Compliance Monitor noted areas of subsidence and erosion of the banks of several waterbodies on the South Spread. The Compliance Monitor informed the Lead EI of the erosion of the banks into the waterbodies and the subsidence issues. The erosion and other issues will be addressed upon the return of the South Spread contractor.
EV-7385	4/06/2020	Mainline / North Spread / MP 59.66 to 59.68 / Grady County	Yes	The Compliance Monitor noted that the bank of a waterbody had eroded underneath the installed erosion control matting. The Compliance Monitor discussed the observed issues with the Lead EI. The Lead EI stated the issue would be addressed with the contractor and the repair work would be initiated.



NONCOMPLIANCE REPORTS

Noncompliance reports record an observation where an area or activity violates (is not in compliance with) the project specifications, results in damage to resources, or places sensitive resources at unnecessary risk. One noncompliance report was issued by the Compliance Monitors and/or compliance management team during this period, as detailed below.

SUMMARY OF NONCOMPLIANCE REPORTS FOR THE MIDSHIP PROJECT				
Report Number	Date Issued	Location (Spread or Facility/ Milepost [MP]/ County)	Follow-up Required (Yes or No)	Noncompliance Description
EV-7389	4/07/2020	Mainline / North Spread / MP 75.00 to 79.70 / Garvin County	Yes	The Compliance Monitor observed the contractor crew burying excess rock on the right-of-way, which is out of compliance with the FERC Plan, Section V.A.3. The Compliance Monitor informed the Lead EI of the observation and inspection staff promptly arrived on-site to correct the issue.



View of excess rock buried on the right-of-way, North Spread, MP 79.70 (see EV-7389 issued on 4/07/2020)



PROBLEM AREA REPORTS

Problem area reports record an observation where an area or activity does not meet the definition of acceptable but is not considered a noncompliance. Five problem area reports were issued by the Compliance Monitors during this period, as detailed below.

SUMMARY OF PROBLEM AREA REPORTS FOR THE MIDSHIP PROJECT				
Report Number	Date Issued	Location (Spread or Facility/ MP/ County)	Follow-up Required (Yes or No)	Problem Area Description
EV-7362	03/30/2020	Mainline/ North Spread/ MPs 73.00 to 78.00/ Grady County	Yes	The Compliance Monitor inspected a restored portion of the right-of-way and noted erosion issues and sediment deposition near a waterbody. The Compliance Monitor noted that the upland area had been previously seeded and covered with mulch. It appeared that the mulch had not been anchored properly as required by the FERC Upland Erosion Control, Revegetation, and Maintenance Plan, section IV.F.4.f. The Compliance Monitor relayed the observation to the Lead EI.
EV-7371	04/01/2020	Mainline/ South Spread/ MPs 123.00 to 141.20/ Carter and Johnston Counties	Yes	The Compliance Monitor conducted an inspection of the right-of-way as part of the in-service request and noted multiple areas of erosion and subsidence. Erosion was noted in upland areas and at waterbodies. Vegetation coverage varied through the area as well. The Compliance Monitor communicated all observed issues to the Lead EI.
EV-7373	04/02/2020	Mainline/ North Spread/ MPs 78.60 to 80.20/ Garvin County	Yes	The Construction Monitor noted that terraces were retaining stormwater, which was overtopping the terrace and causing some erosion. Additionally, the Compliance Monitor noted that the previously restored topsoil was showing some signs of erosion. However, sediment controls had retained the topsoil within the right-of-way boundaries. The topsoil had been replaced, but seed and mulch had not been able to be applied prior to the latest storm event. The contractor representative stated that the stabilization activities would occur as soon as right-of-way conditions allowed. The Compliance Monitor informed the Lead EI of the noted issues.
EV-7376	04/03/2020	Mainline/ South Spread/ MPs 146.00 to 155.00/ Johnston County	Yes	The Compliance Monitor noted bank erosion at two waterbodies. The Compliance Monitor provided the information to the Lead EI. The issues will be addressed when the contractor returns to the South Spread.
EV-7382	04/04/2020	Mainline/ North Spread/ MPs 38.10 to 50.30/ Grady County	Yes	The Compliance Monitor noted an area of minor erosion at a waterbody and a second area of severe erosion within a pasture area due to ineffective stabilization measures. The Compliance Monitor and the Lead EI discussed the issues noted at both areas. The Lead EI stated that the issues would be communicated to the contractor.



PROBLEM AREA REPORTS

Problem area reports record an observation where an area or activity does not meet the definition of acceptable but is not considered a noncompliance. Two problem area reports were issued by the Compliance Monitors during this period, as detailed below.

SUMMARY OF PROBLEM AREA REPORTS FOR THE MIDSHIP PROJECT				
Report Number	Date Issued	Location (Spread or Facility/ MP/ County)	Follow-up Required (Yes or No)	Problem Area Description
EV-7349	3/25/2020	Mainline / North Spread / MP 77.20 to 77.80 / Grady County	Yes	The Compliance Monitor noted that a recently seeded area had not been mulched, which is not compliant with FERC Plan, Section IV. F. 4. a. Due to the recent storm events, erosion was present throughout the tract and leading towards a waterbody. The Compliance Monitor informed the Lead EI of the observations. The Lead EI stated the area would be assessed to determine the appropriate mitigation.
EV-7350	3/25/2020	Mainline / North Spread / MP 83.90 to 84.80 / Garvin County	Yes	The Compliance Monitor noted that a driveway and road crossing were rutted and rough, which is out of compliance with the FERC Plan, Section IV. E. 1. The Compliance Monitor also noted erosion at a waterbody and in the upland portion of a tract. The upland portion of the tract had been seeded but not mulched, which is out of compliance with FERC Plan, Section IV. F. 4. a. The Compliance Monitor discussed the issues with the Lead EI. The Lead EI stated the issues would be addressed with the contractor.



PROBLEM AREA REPORTS

Problem area reports record an observation where an area or activity does not meet the definition of acceptable but is not considered a noncompliance. Two problem area reports were issued by the Compliance Monitors during this period, as detailed below.

SUMMARY OF PROBLEM AREA REPORTS FOR THE MIDSHIP PROJECT				
Report Number	Date Issued	Location (Spread or Facility/ MP/ County)	Follow-up Required (Yes or No)	Problem Area Description
EV-7330	3/19/2020	Mainline / North Spread / MP 57.00 to 57.70 / Grady County	Yes	The Compliance Monitor conducted a follow-up inspection of an area where contractor crews had been conducting erosion and sediment control maintenance and repairing a gap between a silt fence and an equipment bridge (see EV-7328 issued on 03/18/2020). The Compliance Monitor noted that the newly installed erosion control devices had been overwhelmed with sediment flows and storm water and upland sediment had flowed into a waterbody. The erosion and sediment controls had been installed correctly prior to the storm event, but the sediment flows were beyond the design capacity of the installed sediment barriers. The compliance Monitor informed the Lead EI of the issue and the issuance of a problem area report.
EV-7331	3/20/2020	Mainline / North Spread / Tatum Compressor Station / MP 99.00 / Garvin County	Yes	The Compliance Monitor observed erosion at the recently mulched and seeded Tatum Compressor Station that resulted in upland sediment being deposited off the right-of-way. The Compliance Monitor noted that the mulch appeared to be inadequately anchored. The Compliance Monitor and the EI discussed the issues and the EI stated that a contractor environmental crew would repair the erosion and replace the erosion and sediment controls as needed.



NONCOMPLIANCE REPORTS

Noncompliance reports record an observation where an area or activity violates (is not in compliance with) the project specifications, results in damage to resources, or places sensitive resources at unnecessary risk. Two noncompliance reports were issued by the Compliance Monitors and/or compliance management team during this period, as detailed below.

SUMMARY OF NONCOMPLIANCE REPORTS FOR THE MIDSHIP PROJECT				
Report Number	Date Issued	Location (Spread or Facility/ Milepost [MP]/ County)	Follow-up Required (Yes or No)	Noncompliance Description
EV-7321	3/16/2020	Mainline / South Spread / Bennington Compressor Station / 198.50 / Bryan County	Yes	The Compliance Monitor noted that erosion and sediment controls required repair or replacement at Bennington Compressor Station site. The Compliance Monitor and the environmental inspection team had previously discussed the additional stabilization needs of the compressor station, (documented in EV-7062 issued on 1/30/2020). During this inspection, the Compliance Monitor noted that the same erosion and sediment control was in place and had not been improved. The Compliance Monitor also noted that sediment-laden water was entering a waterbody from a stormwater outfall, which is out of compliance with the FERC Plan, Section II.B.12 and Section IV.F.3.c. The Compliance Monitor discussed the issues with the Lead EI.
EV-7337	3/21/2020	Mainline / North Spread / MP 57.00 to 57.10 / Grady County	Yes	The Compliance Monitor noted that a contractor crew had been dewatering to a filter bag placed on a vegetated upland area. The discharged water was laden with fine sediment that migrated into a waterbody, which is out of compliance with FERC Wetland and Waterbody Construction and Mitigation Procedures Section V.B.11. The crew had completed the dewatering activities prior to the arrival of the Compliance Monitor on site. The Compliance Monitor discussed the observations with the EI, and informed him of the issuance of a noncompliance report.



PROBLEM AREA REPORTS

Problem area reports record an observation where an area or activity does not meet the definition of acceptable but is not considered a noncompliance. Three problem area reports were issued by the Compliance Monitors during this period, as detailed below.

SUMMARY OF PROBLEM AREA REPORTS FOR THE MIDSHIP PROJECT				
Report Number	Date Issued	Location (Spread or Facility/ MP/ County)	Follow-up Required (Yes or No)	Problem Area Description
EV-7287	3/06/2020	Mainline / North Spread / MP 57.40 to 57.80 / Grady County	Yes	The Compliance Monitor noted that sediment from trench water pumped through sediment filter bags was being deposited in an upland area adjacent to a waterbody. No sediment from the trench dewatering activities had reached the waterbody. The environmental foreman stated that additional pumping would be suspended. The Compliance Monitor discussed the issue with the Lead EI and informed him of the issuance of the problem area report.
EV-7288	3/07/2020	Mainline / North Spread / MP 75.00 to 75.80 / Grady County	Yes	The Compliance Monitor met with the landowner of tracts GR-0353.000 and GR-0355.000 to discuss the landowner's concerns with cleanup and restoration. Tie-in activities had been completed recently on the tracts and cleanup and restoration had not yet been completed. The landowner stated that he had some concerns about the removal of wood debris in the subsoil, the re-installation of terraces, and re-installation of a flume pipe removed during construction. The Compliance Monitor noted that trash had been left on the right-of-way for an extended period of time, which is out of compliance with the FERC Plan, Section III.E. Additionally, the Compliance Monitor noted that a bank of a waterbody had not been restored, allowing water flow and right-of-way inundation to extend south of the crossing, which is out of compliance with the FERC Procedures, Section V.B.7.a. The Compliance Monitor relayed the issues and concerns to the environmental inspection team.
EV-7289	3/07/2020	Mainline / North Spread / MP 88.40 to 89.20 / Stephens County	Yes	The Compliance Monitor observed the crew replacing topsoil prior to decompacting the subsoil, which is out of compliance with the FERC Plan, V.C.2. The Compliance Monitor and the Lead EI discussed the observation. The crew utility inspector was also informed of the issue.



NONCOMPLIANCE REPORTS

Noncompliance reports record an observation where an area or activity violates (is not in compliance with) the project specifications, results in damage to resources, or places sensitive resources at unnecessary risk. Two noncompliance reports were issued by the Compliance Monitors and/or compliance management team during this period, as detailed below.

SUMMARY OF NONCOMPLIANCE REPORTS FOR THE MIDSHIP PROJECT				
Report Number	Date Issued	Location (Spread or Facility/ Milepost [MP]/ County)	Follow-up Required (Yes or No)	Noncompliance Description
EV-7268	3/02/2020	Mainline / North Spread / MP 90.80 / Garvin County	Yes	The Compliance Monitor noted that road approach rock was removed from the right-of-way and dumped approximately 500 feet off of the right-of-way, which is out of compliance with the FERC Plan, Section III.E. The Compliance Monitor and the Lead EI discussed the issue. The Lead EI stated that the issue would be addressed with the contractor, the rock would be returned to the right-of-way, and/or transported to an approved disposal facility, and that environmental survey coverage of the impacted area would be assessed.
EV-7290	3/07/2020	Mainline / North Spread / MP 70.50 to 72.40 / Grady County	Yes	The Compliance Monitor met with the landowner of tracts GR-0336.000 and GR-0338.000. The landowner expressed concern about the continued inundation of the right-of-way, a large amount of woody debris being mixed into the soil and not removed during cleanup activities, off right-of-way inundation due to a lack of gaps in the topsoil piles, the erosion of the segregated topsoil, and the drainage pipe that was removed during construction activities, but not yet replaced. The Compliance Monitor noted that the area on and off the right-of-way was inundated with water, timber mat and skid wood debris were present throughout the tracts, and the erosion of the topsoil by stormwater. The topsoil piles had been previously stabilized. Tie-in activities had been completed on the tracts during the first week of February 2020, and cleanup activities had not yet begun, which is not compliant with the FERC Plan, Section V.A.1. The Compliance Monitor and the Lead EI discussed the landowner concerns, the observations, and the issues noted on the tracts. The Lead EI stated that the contractor had suspended all work in the area until the soil conditions improved. As documented in communication report EV-7168, issued on 2/17/2020, communication report EV-7178, issued on 2/18/2020, and communication report EV-7195, issued on 2/20/2020, the contractor had planned to remove the water from the site by pumping it into tanks, but this activity had not occurred. The Lead EI also stated that the contractor plans to submit a variance requesting to suspend cleanup in the area.



PROBLEM AREA REPORTS

Problem area reports record an observation where an area or activity does not meet the definition of acceptable but is not considered a noncompliance. Two problem area reports were issued by the Compliance Monitors during this period, as detailed below.

SUMMARY OF PROBLEM AREA REPORTS FOR THE MIDSHIP PROJECT				
Report Number	Date Issued	Location (Spread or Facility/ MP/ County)	Follow-up Required (Yes or No)	Problem Area Description
EV-7227	2/25/2020	Mainline / North Spread / MP 59.01 to 59.67 / Grady County	Yes	The Compliance Monitor noted that the topsoil and subsoil piles were not adequately separated at an anomaly dig up site. The mixing was minor and easily separated. The Compliance Monitor informed the Lead EI of the need to separate the topsoil and subsoil piles and the issuance of a problem area report.
EV-7228	2/25/2020	Mainline / North Spread / MP 53.69 to 59.14 / Grady County	Yes	The Compliance Monitor noted that multiple access roads and the right-of-way boundaries were not adequately marked as required by the project documents during the anomaly dig up activities. The Compliance Monitor and the Lead EI discussed the issue. The Lead EI will address the issue with the contractor.



View of topsoil and subsoil piles not adequately separated, North Spread, MP 59.01 (see EV-7227 issued on 2/25/2020)



PROBLEM AREA REPORTS

Problem area reports record an observation where an area or activity does not meet the definition of acceptable but is not considered a noncompliance. Seven problem area reports were issued by the Compliance Monitors during this period, as detailed below.

SUMMARY OF PROBLEM AREA REPORTS FOR THE MIDSHIP PROJECT				
Report Number	Date Issued	Location (Spread or Facility/ MP/ County)	Follow-up Required (Yes or No)	Problem Area Description
EV-7166	2/17/2020	Mainline / North Spread / MP 83.86 / Garvin County	Yes	During an inspection of a waterbody after the completion of the crossing activities, the Compliance Monitor noted that an erosion control device had failed and sediment-laden water was draining into the waterbody. The Compliance Monitor contacted the EI and the onsite environmental crew immediately began the repairing the erosion control devices. The Compliance Monitor also noted minor erosion on the banks from the crossing activities. The Compliance Monitor informed the EI of the issuance of a problem area report for the sediment-laden water entering the waterbody and the slight bank erosion.
EV-7175	2/18/2020	Mainline / North Spread / MP 87.04 / Stephens County	Yes	The Compliance Monitor noted that the "No Refueling" signage required per the FERC Procedures, Section V.B.3.f., marking the waterbody buffer zone were missing on either side of a waterbody. The Compliance Monitor noted that a piece of equipment had been parked nearby overnight. The Compliance Monitor was unable to determine if the equipment had been parked within the buffer zone of the waterbody due to the lack of signage. No impacts or leaks from the equipment were noted. The Compliance Monitor discussed the missing signage with the EI and the Lead EI. The Compliance Monitor informed the environmental inspection team of the issuance of the problem area report for the missing signage.
EV-7180	2/18/2020	Mainline / North Spread / MP 114.00 to 117.00 / Carter County	Yes	The Compliance Monitor noted that bales of mulch and a piece of equipment had been stockpiled adjacent to and off the right-of-way in a vegetated, upland area, out of compliance with the FERC Plan Section IV.A.1. No sensitive resource impacts occurred due to the placement of the materials off the right-of-way. The Compliance Monitor informed the Lead EI of the issue and the issue was addressed with the crew.



Midcontinent Supply Header Interstate Pipeline Project, Docket No.: CP17-458-000
Environmental Compliance Monitoring Program
February 16 to 22, 2020 Summary Report

SUMMARY OF PROBLEM AREA REPORTS FOR THE MIDSHIP PROJECT				
Report Number	Date Issued	Location (Spread or Facility/ MP/ County)	Follow-up Required (Yes or No)	Problem Area Description
EV-7185	2/19/2020	Mainline / North Spread / MP 83.86 / Garvin County	Yes	The Compliance Monitor noted that sediment from the waterbody bed was displaced by the flume pipes used during the waterbody crossing activities. The sediment displaced by the flume pipes flowed downstream and off the right-of-way. It is not possible to retrieve the sediment from the right-of-way as it is too far off the right-of-way and cannot be reached with equipment. A variance would need to be submitted to retrieve the sediment. Retrieval of the sediment may result in greater environmental impacts and the impacts to retrieve the sediment should be assessed prior to the issuance of a variance. The Compliance Monitor informed the environmental inspection team of the issue.
EV-7197	2/20/2020	Mainline / South Spread / MP 169.00 to 169.60 / Johnston County	Yes	The Compliance Monitor inspected tracts JO-0857.000 and JO-0858.000 in response to a FERC Help Line complaint regarding erosion. Cleanup and restoration activities had been completed on the two tracts. The Compliance Monitor noted that revegetation was variable and ranged from zero to 50 percent, the mulch was missing at various locations, erosion was observed throughout the tracts, and trench line subsidence was noted. The Compliance Monitor discussed the observed issues with the Lead EI. The Lead EI stated that repairs of the issues would be coordinated with the environmental contractor.
EV-7217	2/22/2020	Mainline / North Spread / MP 83.50 to 85.00 / Garvin County	Yes	The Compliance Monitor noted that the soil had been disturbed off the right-of-way in an upland area when the contractor returned the used dewatering bags to the right-of-way. No mixing of topsoil and subsoil occurred. The Compliance Monitor informed the environmental inspection team of the issue.
EV-7218	2/22/2020	Mainline / North Spread / MP 96.80 to 96.90 / Garvin County	Yes	The Compliance Monitor noted that the mulch was not adequately anchored as required by the FERC Plan, Section IV. F. 4. f. Additionally, the Compliance Monitor observed that the waterbody bridges were removed, restricting equipment access to the area. The Compliance Monitor discussed the issue with the EI.



NONCOMPLIANCE REPORTS

Noncompliance reports record an observation where an area or activity violates (is not in compliance with) the project specifications, results in damage to resources, or places sensitive resources at unnecessary risk. One noncompliance report was issued by the Compliance Monitors and/or compliance management team during this period, as detailed below.

SUMMARY OF NONCOMPLIANCE REPORTS FOR THE MIDSHIP PROJECT				
Report Number	Date Issued	Location (Spread or Facility/ Milepost [MP]/ County)	Follow-up Required (Yes or No)	Noncompliance Description
EV-7184	2/19/2020	Mainline / North Spread / MP 71.93 / Grady County	Yes	<p>The Compliance Monitor inspected the recently crossed waterbody on tract GR-0338.000, a condemnation tract, and noted that one of the waterbody banks had not been restored to pre-construction contours after the completion of the crossing activities. The Compliance Monitor discussed the issue with the EI on site who stated that he considered the bank adequately restored. After sending the Lead EI a photo of the restored bank, the Compliance Monitor and the Lead EI discussed the issue. The Lead EI concurred that the bank was inadequately restored and addressed the issue with the cleanup foreman. The cleanup foreman stated that the bank would be reworked during the bridge removal activities. The Compliance Monitor also noted that the bridge over the waterbody required cleaning and the geotextile liner required repair or replacement. No sediment was noted in the waterbody. The EI was informed of the issue and the need to clean and repair the bridge in a timely manner. The Compliance Monitor also noted that the timber mats were still being covered with soil during the cleanup activities and were no longer visible under the subsoil. This issue was previously reported in communication report EV-7178 issued on 02/18/2020. Cleanup activities were ongoing in the area. The Compliance Monitor again discussed the potential issue with the Lead EI. The Compliance Monitor also discussed the large load of rocks delivered to the area the previous day (previously documented in communication report EV-7178 issued on 02/18/2020) with the EI. The EI stated that the crew had buried the rocks on the right-of-way. All trenches had been backfilled on site prior to the inspection on 2/18/2020. Neither the EI nor the Compliance Monitor was able to locate the buried rocks. Per the FERC Plan, Section V.A.3., rock excavated from the trench may be used to backfill the trench only to the top of the existing bedrock profile. Rock that is not returned to the trench shall be considered construction debris, unless approved for use as mulch or for some other use on the construction work areas by the landowner or land managing agency. The EI was unaware of the compliance issue associated with burying rocks on the right-of-way. The Compliance Monitor informed the Lead EI that a noncompliance report would be issued for the burial of the rocks on the right-of-way. The Compliance Monitor and the</p>



Midcontinent Supply Header Interstate Pipeline Project, Docket No.: CP17-458-000
Environmental Compliance Monitoring Program
February 16 to 22, 2020 Summary Report

SUMMARY OF NONCOMPLIANCE REPORTS FOR THE MIDSHIP PROJECT

Report Number	Date Issued	Location (Spread or Facility/ Milepost [MP]/ County)	Follow-up Required (Yes or No)	Noncompliance Description
				Lead EI discussed the need to locate, excavate, and adequately dispose of the rocks. The Lead EI addressed the issue with the contractor. The contractor representative stated that the rocks would be excavated and disposed of properly.



View of rocks delivered to the site and buried on the right-of-way. Photo was taken during the 2/18/2020 inspection. Rocks were buried onsite after the 2/18/2020 inspection, North Spread, MP 71.93 (see EV-7184 issued on 2/19/2020).



PROBLEM AREA REPORTS

Problem area reports record an observation where an area or activity does not meet the definition of acceptable but is not considered a noncompliance. One problem area report was issued by the Compliance Monitors during this period, as detailed below.

SUMMARY OF PROBLEM AREA REPORTS FOR THE MIDSHIP PROJECT				
Report Number	Date Issued	Location (Spread or Facility/ MP/ County)	Follow-up Required (Yes or No)	Problem Area Description
EV-7091	2/3/2020	Velma Lateral / North Spread / MP 1.50 to 2.00 / Stephens County	Yes	The Compliance Monitor noted that seed and mulch had not been applied to the replaced topsoil within the timeframe required by the FERC Plan, Section V.D.3.d. The Compliance Monitor relayed the issue to the Lead EI to be addressed with the contractor.



View of replaced topsoil without seed or mulch, Velma Lateral, North Spread, MP 1.50 (see EV-7091 issued on 2/3/2020).



NONCOMPLIANCE REPORTS

Noncompliance reports record an observation where an area or activity violates (is not in compliance with) the project specifications, results in damage to resources, or places sensitive resources at unnecessary risk. One noncompliance report was issued by the Compliance Monitors and/or compliance management team during this period, as detailed below.

SUMMARY OF NONCOMPLIANCE REPORTS FOR THE MIDSHIP PROJECT				
Report Number	Date Issued	Location (Spread or Facility/ Milepost [MP]/ County)	Follow-up Required (Yes or No)	Noncompliance Description
EV-7122	2/8/2020	Mainline / North Spread / MP 81.09 to 81.17 / Garvin County	Yes	The Compliance Monitor noted that multiple pieces of equipment had been parked overnight within the buffer zone of a waterbody, which is out of compliance with the FERC Procedures, Section IV.A.1.d. The Compliance Monitor informed the lead EI and the EI of the issue and the issuance of a noncompliance report.



View of equipment parked within the waterbody buffer zone, North Spread, MP 81.11 (see EV-7122 issued on 2/8/2020)



PROBLEM AREA REPORTS

Problem area reports record an observation where an area or activity does not meet the definition of acceptable but is not considered a noncompliance. One problem area report was issued by the Compliance Monitors during this period, as detailed below.

SUMMARY OF PROBLEM AREA REPORTS FOR THE MIDSHIP PROJECT				
Report Number	Date Issued	Location (Spread or Facility/ MP/ County)	Follow-up Required (Yes or No)	Problem Area Description
EV-7061	1/30/20	Mainline/ North Spread/ MP 77.82/ Grady County	Yes	The Compliance Monitor noted that the bank topsoil and waterbody bed soil had been adequately segregated in geotextile lined locations. However, during the recent rain event, stormwater flowed into the two segregation locations, and was mixing with the bottom of the soil piles. The Compliance Monitor and the EI discussed the issue. The EI stated he would address the issue with the contractor to ensure the bank topsoil and creek bed material will be adequately re-segregated and stabilized.



View of creek bank topsoil mixing with silt-laden stormwater, Mainline, North Spread, milepost 77.82. The Compliance Monitor issued a problem area report to document the issue (see EV-7061 dated 1/30/2020).



NONCOMPLIANCE REPORTS

Noncompliance reports record an observation where an area or activity violates (is not in compliance with) the project specifications, results in damage to resources, or places sensitive resources at unnecessary risk. One noncompliance report was issued by the Compliance Monitors and/or compliance management team during this period, as detailed below.

SUMMARY OF NONCOMPLIANCE REPORTS FOR THE MIDSHIP PROJECT				
Report Number	Date Issued	Location (Spread or Facility/ Milepost [MP]/ County)	Follow-up Required (Yes or No)	Noncompliance Description
EV-7050	1/29/20	Mainline/ North Spread/ MP 77.82/ Grady County	Yes	The Compliance Monitor observed silt-laden water from the right-of-way draining into a waterbody, which is in violation of the FERC Plan, Section V.B.10. The Compliance Monitor contacted the Lead EI and the EI to inform them of the issue. The Compliance Monitor also informed them that a noncompliance report would be issued for the impact to a sensitive resource from the lack of erosion and sediment controls that allowed sediment to enter the waterbody. The Lead EI stated that he would address the issue with the contractor.



View of mixing of clean and silt-laden water, Mainline, North Spread, milepost 77.82. The Compliance Monitor issued a noncompliance report associated with the issues at this site (see EV-7050 dated 01/29/2020).



NONCOMPLIANCE REPORTS

Noncompliance reports record an observation where an area or activity violates (is not in compliance with) the project specifications, results in damage to resources, or places sensitive resources at unnecessary risk. Four noncompliance reports were issued by the Compliance Monitors and/or compliance management team during this period, as detailed below.

SUMMARY OF NONCOMPLIANCE REPORTS FOR THE MIDSHIP PROJECT				
Report Number	Date Issued	Location (Spread or Facility/ Milepost [MP]/ County)	Follow-up Required (Yes or No)	Noncompliance Description
EV-6977	01/20/20	Mainline/ North Spread/ MP 86.74 to 87.04/ Stephens County	Yes	The Compliance Monitor observed the following issues at a tie-in location: Two pieces of equipment that had been parked overnight within the buffer zone of the waterbody (out of compliance with FERC Procedures, Section IV.A.1.d.); Required environmental sign ("no refueling" sign) removed from buffer zone boundary and set on the track of piece of equipment (out of compliance with FERC Procedures, Section IV.A.1.f.); Pump left overnight outside of a secondary containment within the buffer zone of the waterbody (out of compliance with FERC Procedures, Section IV.A.1.g.); Mixing of topsoil and subsoil (out of compliance with FERC Plan, Section IV.B.4.); Improper topsoil stabilization (out of compliance with FERC Plan, Section IV.B.6.); Three silt fences deliberately sliced at the bottom to let silt laden water drain off the right-of-way (out of compliance with FERC Plan, Section IV.F.); One dewatering bag cut to let the silt laden water drain out faster (out of compliance with FERC Procedures, Section V.B.11.); and Lack of monitoring of dewatering activities (out of compliance with FERC Plan, Section II.B.7.). The Compliance Monitor informed the EI of the multiple issues. The EI and the Environmental Coordinator arrived at the site and conducted an inspection with the Compliance Monitor. The Compliance Monitor, the Environmental Coordinator, and the EI agreed that the site was grossly out of compliance and the crew had made no effort to stay in compliance. Additionally, the crew had deliberately damaged the previously installed erosion and sediment control devices and moved the project required signage. The contractor environmental crew began addressing the issues as soon as they were reported. The entire tie in crew was subsequently removed from additional project work.
EV-7007	01/23/20	Mainline / North Spread / MP 59.14 to 59.67 / Grady County	Yes	The Compliance Monitor observed deep ruts in the topsoil caused by a survey crew driving on the saturated, restored right-of-way. The Compliance Monitor noted that the mixing of topsoil and subsoil occurred in several areas, which is out of compliance with the FERC Plan, Section IV.B.4. The Compliance Monitor discussed the observations with the Lead EI and advised him of the issuance of a noncompliance report for the mixing of topsoil with subsoil. The Compliance Monitor was subsequently



Midcontinent Supply Header Interstate Pipeline Project, Docket No.: CP17-458-000
 Environmental Compliance Monitoring Program
 January 19 through 25, 2020 Summary Report

SUMMARY OF NONCOMPLIANCE REPORTS FOR THE MIDSHIP PROJECT

Report Number	Date Issued	Location (Spread or Facility/ Milepost [MP]/ County)	Follow-up Required (Yes or No)	Noncompliance Description
				informed that the survey crew in question was removed from the project.
EV-7020	01/24/20	Mainline/ North Spread/ MP 110.90 to 111.00/ Carter County	Yes	The Compliance Monitor noted that all the erosion control devices had been removed from the edge of a waterbody that had been used as a hydrostatic test water source. The area had been graded and no erosion control devices had been installed prior to the latest rain event, which is out of compliance with the FERC Plan, Section IV.F. Sediment deposition into the waterbody was not observed. The Compliance Monitor discussed the issue with the Lead EI. The Lead EI stated that the issue would be addressed with the contractor.
EV-7032	01/25/20	Mainline/ North Spread/ MP 95.00/ Garvin County	No	The Compliance Monitor noted that the contractor crew had placed dewatering filter bags on the banks of a waterbody. Several crew members were observed walking on the bags causing sediment laden water to be released into the waterbody. The dewatering activities were out of compliance with the FERC Plan, Section II.B.7. The crew members ceased the activity and dewatering pump operation was halted. The Compliance Monitor also noted that subsoil spoil was stockpiled against segregated topsoil, which is out of compliance with the FERC Plan, Section IV.B.4. The Compliance Monitor informed the lead EI and the EI of the issues and the issuance of the noncompliance report. A contractor environmental crew arrived on site to assist with the dewatering activities. The environmental crew installed filter bags in a proper location away from the waterbody.



PROBLEM AREA REPORTS

Problem area reports record an observation where an area or activity does not meet the definition of acceptable but is not considered a noncompliance. Five problem area reports were issued by the Compliance Monitors during this period, as detailed below.

SUMMARY OF PROBLEM AREA REPORTS FOR THE MIDSHIP PROJECT				
Report Number	Date Issued	Location (Spread or Facility/ MP/ County)	Follow-up Required (Yes or No)	Problem Area Description
EV-6929	01/13/20	Mainline / North Spread / MP 89.80 / Garvin County	Yes	The Compliance Monitor noted that soil had spilled off the right-of-way in an upland area, which is out of compliance with the FERC Plan, Section IV.A.1. The Compliance Monitor notified the Lead EI of the issue. The area where the soil spilled is well vegetated and subsoil should be able to be retrieved with no damage to the off right-of-way area.
EV-6933	01/13/20	Mainline / North Spread / MP 90.90 to 91.10 / Garvin County	Yes	The Compliance Monitor noted that soil had spilled off the right-of-way in an upland area, which is out of compliance with the FERC Plan, Section IV.A.1. The Compliance Monitor notified the Lead EI of the issue. The soil should be able to be retrieved with no damage to the off right-of-way area.
EV-6970	1/17/2020	Mainline / South Spread / Bennington Compressor Station / MP 198.50 / Bryan County	Yes	The Compliance Monitor noted that the sediment control device installed at the stormwater retention pond at the Bennington Compressor Station was in need of maintenance. Sediment was also noted in the riprap lined stormwater retention pond receiving drainage ditch that leads to a waterbody. Both sediment control devices required maintenance. The Compliance Monitor informed the environmental inspection team of the issue.
EV-6973	1/18/2020	Mainline / North Spread / MP 77.82 / Grady County	Yes	The Compliance Monitor inspected the right-of-way at a waterbody crossing. The crossing activities had been postponed due to the saturated right-of-way conditions. The Compliance Monitor noted that several erosion control devices had failed and required repair and that a small amount of sediment had drained in the waterbody and needed to be removed. All the erosion control devices were functional and in good repair prior to the rain event. The Compliance Monitor informed the EI of the issues. A contractor crew began repairs of the erosion control devices while the Compliance Monitor was on site.



Midcontinent Supply Header Interstate Pipeline Project, Docket No.: CP17-458-000
Environmental Compliance Monitoring Program
January 12 through 18, 2020 Summary Report

SUMMARY OF PROBLEM AREA REPORTS FOR THE MIDSHIP PROJECT

Report Number	Date Issued	Location (Spread or Facility/ MP/ County)	Follow-up Required (Yes or No)	Problem Area Description
EV-6974	1/18/2020	Mainline / North Spread / MP 71.05 / Grady County	Yes	The Compliance Monitor conducted a follow-up inspection of tract GR-0338.000. The Compliance Monitor had met with the landowner of the tract and documented several issues on 1/15/2020 (documented in communication report EV-6950). The Compliance Monitor noted that the edge of the right-of-way had been adequately re-staked. The Compliance Monitor also noted that additional water had accumulated behind the topsoil pile due to the latest rain event and the water was partially blocking the landowner's access road. The contractor had previously removed a drainage pipe installed by the landowner so that an equipment bridge could be installed. The Compliance Monitor noted that the water from the rain event had eroded the area around the bridge and partially collapsed the banks of the drainage. A contractor crew was addressing the erosion issue during the inspection. The EI arrived on site during the inspection. The Compliance Monitor discussed the erosion and drainage issues with the EI.



View of spoil off the right-of-way, North Spread, MP 89.80 (see EV-6929 issued on 01/13/20)



NONCOMPLIANCE REPORTS

Noncompliance reports record an observation where an area or activity violates (is not in compliance with) the project specifications, results in damage to resources, or places sensitive resources at unnecessary risk. Three noncompliance reports were issued by the Compliance Monitors and/or compliance management team during this period, as detailed below.

SUMMARY OF NONCOMPLIANCE REPORTS FOR THE MIDSHIP PROJECT				
Report Number	Date Issued	Location (Spread or Facility/Milepost [MP]/ County)	Follow-up Required (Yes or No)	Noncompliance Description
EV-6939	01/14/20	Mainline / North Spread / MP 77.90 / Grady County	No	The Compliance Monitor observed a Midship project staff member utilizing an unapproved road, which is out of compliance with the FERC Plan, Section IV.A.1. The Compliance Monitor observed that a sign had been posted stating "no access" to prevent trespassing beyond the right-of-way boundaries. The Compliance Monitor pointed out the sign to the project staff member who stated that he knew that the area was off the right-of-way. The Compliance Monitor informed the project staff member that he was trespassing. The Compliance Monitor also informed the environmental inspection team that a noncompliance report would be issued to document the activity.
EV-6959	01/16/20	Chisholm Lateral / North Spread / MP 3.89 / Kingfisher County	No	The Compliance Monitor noted that a piece of equipment had been parked overnight within the buffer zone of a waterbody, which is out of compliance with the FERC Procedures, Section IV.A.1.d. The Compliance Monitor informed the EI that a noncompliance report would be issued. The EI stated he would address the issue with the contractor and have the equipment moved.
EV-6976	01/18/20	Mainline / North Spread / MP 40.65 to 40.73/ Grady County	Yes	The Compliance Monitor conducted an inspection of an anomaly dig up site and noted multiple issues, including: Missing right-of-way boundary stakes (out of compliance with FERC Plan, Section II.B.3.); Erosion caused by dewatering activities (out of compliance with FERC Plan, Section II.B.7.); Inadequate topsoil and subsoil segregation (out of compliance with FERC Plan, FERC Plan, Section IV.B.4.); Topsoil lacking stabilization (out of compliance with FERC Plan, FERC Plan, Section IV.B.6.); and Erosion control devices that required maintenance (out of compliance with FERC Plan, Section II.B.5.). Rainfall of approximately 1.0 inch occurred on 1/16/2020. The crew began asking the Compliance Monitor for guidance regarding the environmental compliance issues. The Compliance Monitor referred the crew to the EI. Per the FERC Plan, Section II.B.13.a, it is the responsibility of the EI to inspect and ensure the maintenance of temporary erosion control measures at least on a daily basis in areas of active construction or equipment operation. In addition, per the FERC Plan, Section II.B.13.c, it is the responsibility of the EI to inspect and ensure the maintenance of



Midcontinent Supply Header Interstate Pipeline Project, Docket No.: CP17-458-000
 Environmental Compliance Monitoring Program
 January 12 through 18, 2020 Summary Report

SUMMARY OF NONCOMPLIANCE REPORTS FOR THE MIDSHIP PROJECT

Report Number	Date Issued	Location (Spread or Facility/Milepost [MP]/ County)	Follow-up Required (Yes or No)	Noncompliance Description
				temporary erosion control measures within 24 hours of each 0.5 inch or greater of rainfall. The Compliance Monitor contacted the Lead EI to inform him that an EI was needed on site to address issues on site with the crew. The Compliance Monitor also informed the Lead EI that a noncompliance report would be issued for the lack of required oversight, as well as the multiple other compliance issues observed.



View of access road with "No Access" sign in place and visible at the edge of right-of-way boundary, North Spread, MP 77.90 (see EV-6939 issued on 01/14/20).



PROBLEM AREA REPORTS

Problem area reports record an observation where an area or activity does not meet the definition of acceptable but is not considered a noncompliance. Eight problem area reports were issued by the Compliance Monitors during this period, as detailed below.

SUMMARY OF PROBLEM AREA REPORTS FOR THE MIDSHIP PROJECT				
Report Number	Date Issued	Location (Spread or Facility/ MP/ County)	Follow-up Required (Yes or No)	Problem Area Description
EV-6858	1/6/20	Mainline / North Spread/ MP 96.50 to 96.50/ Garvin County	Yes	The Compliance Monitor noted that absorbent pads had been placed over a spill, but the oil saturated soil had not been removed from the right-of-way as required by the project-specific Spill Prevention and Response Procedures. The Compliance Monitor notified the Lead EI of the issue. The Lead EI stated that contractor would be notified of the spill and the need to clean up the impacted soil and absorbent pads.
EV-6861	1/7/20	Mainline / North Spread/ MP to 88.83 to 88.83/ Stephens County	No	The Compliance Monitor noted that the water flow was not being adequately maintained during the dam and pump activities as required by the FERC Procedures, Section V.B.3.e. Water flow was low and the contractor crew was letting the water rise behind the steel plate before pumping it down stream, creating periods when the water flow was interrupted. The Compliance Monitor informed the EI of the issue. The Compliance Monitor and the EI discussed either adjusting the dam and pump equipment to ensure uninterrupted flow or installing a flume pipe for the water to flow unimpeded. The EI addressed the issue with the crew.
EV-6873	1/7/20	Mainline / North Spread/ MP to 111.00 to 111.00/ Carter County	Yes	The Compliance Monitor noted that a piece of equipment had leaked diesel fuel in an upland area. Identification of the spill and remediation response were not compliant with Midship's Spill Prevention and Response Procedures. The on-site contractor environmental crew began the cleanup activities.
EV-6879	1/8/20	Mainline/ North Spread/ MP 85.72 to 85.80/ Stephens County	Yes	The Compliance Monitor observed that topsoil and subsoil were starting to mix in several locations, out of compliance with the FERC Plan, Section IV.B.4. The mixing was minor, and due to the topsoil piles being hydro-mulched, the subsoil could be removed with no loss of topsoil. The Compliance Monitor informed the EI of the mixing and the issuance of a problem area report.



Midcontinent Supply Header Interstate Pipeline Project, Docket No.: CP17-458-000
Environmental Compliance Monitoring Program
January 5 through 11, 2020 Summary Report

SUMMARY OF PROBLEM AREA REPORTS FOR THE MIDSHIP PROJECT

Report Number	Date Issued	Location (Spread or Facility/ MP/ County)	Follow-up Required (Yes or No)	Problem Area Description
EV-6881	01/08/20	Mainline/ North Spread/ MP 82.37 to 83.86/ Garvin County	Yes	The Compliance Monitor noted that several temporary erosion control devices in an active construction area were damaged and required maintenance or replacement, as per the FERC Plan, Section II.B.13.a. In the same area, the Compliance Monitor noted several topsoil piles that had not yet been stabilized, as required by the FERC Plan, Section IV.B.6. The Compliance Monitor observed that a contractor crew began addressing some of the issues during the inspection. As some corrective actions began during the inspection and no sensitive resources were impacted at the time of the inspection, the Compliance Monitor informed the EI that a problem area report would be issued for the pending issues.
EV-6899	01/09/20	Chisolm Lateral/ North Spread/ MP 3.46/ Kingfisher County	No	The Compliance Monitor and the EI noted that a contractor crew was dewatering the trench onto a county dirt road. The water coming out of the dewatering bags was clear, but was picking up sediment from the road. The water was flowing down the side of the road and eventually entering a nearby waterbody. The waterbody was already extremely turbid, and the water that the crew was dewatering was adding to the turbidity. Per the FERC Plan, Section II.B.7. dewatering activities should be done in a well vegetated area, away from public road and should be monitored to ensure compliance and to ensure that they do not result in the deposition of sand, silt, and/or sediment into sensitive environmental resource areas, such as waterbodies. The EI informed crew of the issue. The dewatering bags were moved into a vegetated area.
EV-6907	01/10/20	Mainline/ North Spread/ MP 96.0 to 96.7/ Garvin County	Yes	The Compliance Monitor noted trash scattered around an active construction area. The EI, and subsequently, the foreman were informed that the trash scattered around the right-of-way was out of compliance with the FERC Plan, Section III.E., and that regular collection, containment, and disposal of the trash needed to be initiated. The foreman stated that the trash would be removed.
EV-6921	01/11/20	Mainline/ North Spread/ MP 90.6 to 90.7 / Garvin County	Yes	The Compliance Monitor note that subsoil spilled off the right-of-way in an area approximately 5 feet by 35 feet. Soil off the right-of-way is out of compliance with the FERC Plan, Section, IV.A.1. The upland area was vegetated and retrieval of the materials will be able to be accomplished with no damage. The Compliance Monitor informed the Midship Environmental Coordinator of the observation. The Midship Environmental Coordinator stated that he would address the issue with the contractor.



NONCOMPLIANCE REPORTS

Noncompliance reports record an observation where an area or activity violates (is not in compliance with) the project specifications, results in damage to resources, or places sensitive resources at unnecessary risk. Three noncompliance reports were issued by the Compliance Monitors and/or compliance management team during this period, as detailed below.

SUMMARY OF NONCOMPLIANCE REPORTS FOR THE MIDSHIP PROJECT				
Report Number	Date Issued	Location (Spread or Facility/ Milepost [MP]/ County)	Follow-up Required (Yes or No)	Noncompliance Description
EV-6849	01/06/20	Mainline/ North Spread/ MP 88.83/ Stephens County	Yes	The Compliance Monitor noted that the erosion control devices had not been replaced across an equipment bridge over a waterbody as required per the FERC Procedures, Section V.B.10.a. The Compliance Monitor informed the Lead EI and the EI that a noncompliance report would be issued.
EV-6897	01/09/20	Chisolm Lateral/ North Spread/ MP 3.46 to 7.63/ Kingfisher County	Yes	The Compliance Monitor noted that temporary erosion control devices were missing from the anomaly dig up sites adjacent to several waterbodies. The FERC Plan, Section IV.F., requires the installation of temporary erosion controls immediately after the disturbance of the soil, and that temporary erosion control devices must be properly maintained throughout construction. The FERC Procedures, Section V.B.10.a., requires the installation of sediment barriers at all waterbody crossings to prevent the flow of sediments into the waterbody. The Compliance Monitor informed the EI of the problem and the issuance of a noncompliance report. The Compliance Monitor later observed a contractor crew beginning the erosion control device installation where needed.
EV-6898	01/09/20	Chisolm Lateral/ North Spread/ MP 3.90/ Kingfisher County	No	The Compliance Monitor observed project personnel accessing the right-of-way via an unapproved access road. The use of the unapproved access road constitutes a trespass and is out of compliance with the FERC Plan, Section III.A.1. The Compliance Monitor informed the EI of the problem and the issuance of a noncompliance report. The Compliance Monitor later observed that new "no project access" signs had been installed.



PROBLEM AREA REPORTS

Problem area reports record an observation where an area or activity does not meet the definition of acceptable but is not considered a noncompliance. Four problem area reports were issued by the Compliance Monitors during this period, as detailed below.

SUMMARY OF PROBLEM AREA REPORTS FOR THE MIDSHIP PROJECT				
Report Number	Date Issued	Location (Spread or Facility/ MP/ County)	Follow-up Required (Yes or No)	Problem Area Description
EV-6830	12/31/19	Mainline/ North Spread/ MPs 38.20 to 39.98/ Grady County	Yes	The Compliance Monitor noted multiple areas where the mulch had not been anchored as required per the Plan, Section IV.F.4.f. The Compliance Monitor planned to discuss the issue with the Midship environmental inspection team upon their return from the holiday break.
EV-6832	01/02/20	Mainline/ North Spread/ MPs 42.19 to 48.70/ Grady County	Yes	The Compliance Monitor noted multiple areas where the mulch had not been anchored as required per the Plan, Section IV.F.4.f. , and issued a problem area report. The Compliance Monitor planned to discuss the issue with the Midship environmental inspection team upon their return from the holiday break. The Compliance Monitor also noted topsoil replacement had not been completed on a section of the right-of-way that had been backfilled prior to the holiday break. Per the FERC Plan, Section V.A.1., cleanup activities should commence immediately following backfill activities and topsoil replacement should be completed within 20 days after backfilling activities. The Compliance Monitor planned to discuss the dates of the backfill activities, and the pending final cleanup activities with the Lead EI and the EI upon their return from the holiday break.
EV-6837	01/03/20	Mainline/ North Spread/ MPs 97.00 to 97.70/ Garvin County	Yes	The Compliance Monitor noted that the right-of-way erosion control devices had been overwhelmed, resulting in sediment off the right-of-way during the rainfall event the previous week, which is out of compliance with the the FERC Plan, Section B.II.14. The Compliance Monitor informed the Lead EI of the issue.
EV-6839	01/03/20	Mainline/ North Spread/ MPs 108.00 to 117.00/ Carter County	Yes	The Compliance Monitor noted that the clean-up activities had been suspended along a portion of the right-of-way pending the completion of the anomaly data collection activities. Per the FERC Plan, Section V.A.1., cleanup operations needed to begin immediately following backfilling activities, and final grading, topsoil replacement, and installation of permanent erosion control structures must occur within 20 days of backfilling the trench. The Compliance Monitor informed the Midship environmental inspection team of the issuance of the problem area report.



NONCOMPLIANCE REPORTS

Noncompliance reports record an observation where an area or activity violates (is not in compliance with) the project specifications, results in damage to resources, or places sensitive resources at unnecessary risk. Three noncompliance reports were issued by the Compliance Monitors and/or compliance management team during this period, as detailed below.

SUMMARY OF NONCOMPLIANCE REPORTS FOR THE MIDSHIP PROJECT				
Report Number	Date Issued	Location (Spread or Facility/ Milepost [MP]/ County)	Follow-up Required (Yes or No)	Noncompliance Description
EV-6835	01/03/20	Mainline / North Spread / MP 34.77 to 81.56 / Grady and Garvin Counties	Yes	The Compliance Monitor conducted a follow-up inspection of the areas where the EI issued multiple problem area reports on 12/29/2019, (documented in communication reports EV-6821, EV-6822, EV-6823, EV-6824, EV-6825, and EV-6826) for erosion control devices in need of maintenance or replacement and failed erosion control devices. As noted in the previous reports, the EI informed the contractor representative of the issues on 12/29/2019. Per the FERC Plan, Section II.B.14, the repair of all ineffective temporary erosion control measures are required to be completed within 24 hours of identification. The Compliance Monitor noted that the majority of the documented issues with the erosion control devices had not been addressed. Sediment had also not been retrieved from the waterbodies. The Compliance Monitor informed the Lead EI and the EI of the observations and informed them that a noncompliance report would be issued.
EV-6841	01/04/20	Mainline / North Spread / MP 81.97 to 81.97 / Garvin County	Yes	The Compliance Monitor noted a piece of equipment parked overnight within 100 feet of a waterbody, out of compliance with the FERC Procedures, Section IV.A.1.d. The Compliance Monitor informed the Lead EI that a noncompliance report would be issued.
EV-6842	01/04/20	Mainline / North Spread / MP 81.96 to 81.96 / Garvin County	Yes	The Compliance Monitor noted that multiple vehicles were accessing the right-of-way via a non-approved access road, which is out of compliance with the FERC Plan, Section IV.A.1. The Compliance Monitor discussed the issue with the Lead EI and the EI. The Compliance Monitor and the environmental inspection team discussed the installation of "no-access" signs to prevent future trespassing in the area.



PROBLEM AREA REPORTS

Problem area reports record an observation where an area or activity does not meet the definition of acceptable but is not considered a noncompliance. Three problem area reports were issued by the Compliance Monitors during this period, as detailed below.

SUMMARY OF PROBLEM AREA REPORTS FOR THE MIDSHIP PROJECT				
Report Number	Date Issued	Location (Spread or Facility/ MP/ County)	Follow-up Required (Yes or No)	Problem Area Description
EV-6759	12/16/19	Mainline / North Spread / MP 85.80 / Stephens County	No	The Compliance Monitor inspected the crossing activities at a waterbody and observed that a steel plate had been installed upstream in the waterbody. No pumps had been set up, and the small flow of water was interrupted for about an hour. Per the FERC Procedures, Section V.B.3.e., waterbody flow rates need to be maintained during crossing activities. The Compliance Monitor later observed that the crew had set up the pumps, and the waterbody flow was no longer interrupted. The Compliance Monitor contacted the EI, informed him of the issues and stated that a problem area report would be issued.
EV-6773	12/17/19	Mainline / South Spread / MP 111.00 / Carter County	Yes	The Compliance Monitor noted that the pump being utilized for hydrostatic test water appropriation was in inadequate secondary containment. No spills or leaks were observed. Per the FERC Procedures, Section IV.A.1.g., all pumps operating within 100 feet of a waterbody must utilize appropriate secondary containment systems to prevent spills. The Compliance Monitor informed the Lead EI of the inadequacy of the secondary containment and that a problem area report would be issued.
EV-6804	12/20/19	Mainline / North Spread / MP 110.00 to 112.00 / Carter County	Yes	The Compliance Monitor noted that final grading, topsoil replacement, and installation of permanent erosion control structures had not occurred within 20 days after backfilling the trench as required by the FERC Plan V.A.1. The Compliance Monitor discussed the need to complete the restoration of the right-of-way with the Lead EI. The Lead EI stated that Midship and the contractor elected to suspend final cleanup activities, including topsoil replacement and restoration, pending the outcome of the hydrostatic testing and anomaly assessment.



NONCOMPLIANCE REPORTS

Noncompliance reports record an observation where an area or activity violates (is not in compliance with) the project specifications, results in damage to resources, or places sensitive resources at unnecessary risk. One noncompliance report was issued by the Compliance Monitors and/or compliance management team during this period, as detailed below.

SUMMARY OF NONCOMPLIANCE REPORTS FOR THE MIDSHIP PROJECT				
Report Number	Date Issued	Location (Spread or Facility/ Milepost [MP]/ County)	Follow-up Required (Yes or No)	Noncompliance Description
EV-6768	12/17/19	Mainline / North Spread / Noncompliance / MP 85.80 / Stephens County	Yes	The Compliance Monitor inspected a waterbody during post crossing activities and noted that the restoration of the streambed was inadequate and the flow of water was impeded. The Compliance Monitor noted that water was present upstream, blocked by the improperly restored streambed at the crossing location, and water was not present downstream of the crossing. Per the FERC Procedures, Section V.B.3.e., adequate flow rates need to be maintained. The Compliance Monitor also noted multiple pieces of equipment had been parked overnight within 100 feet of the waterbody, and a light plant was placed within inadequate secondary containment device within 100 feet of the waterbody. Per the FERC Procedures, Section IV.A.1.d, all equipment is to be parked overnight at least 100 feet from a waterbody. The Compliance Monitor contacted the EI and the Lead EI and informed them of the multiple deficiencies and that a noncompliance report would be issued.

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**PROBLEM AREA REPORTS**

Problem area reports record an observation where an area or activity does not meet the definition of acceptable but is not considered a noncompliance. Three problem area reports were issued by the Compliance Monitors during this period, as detailed below.

SUMMARY OF PROBLEM AREA REPORTS FOR THE MIDSHIP PROJECT				
Report Number	Date Issued	Location (Spread or Facility/ MP/ County)	Follow-up Required (Yes or No)	Problem Area Description
EV-6650	12/4/19	Mainline / North Spread / MP 114.20 / Carter County	Yes	The Compliance Monitor noted equipment within inadequate secondary containment within 100 feet of a waterbody. No fuel, coolant or oil leaks were observed from the equipment. The Compliance Monitor informed the Lead EI of the issue and the Lead EI stated that the equipment would be moved.
EV-6669	12/6/19	Velma Lateral / North Spread / MP 5.00 to 5.20 / Stephens County	Yes	The Compliance Monitor noted that soil had spilled off the right-of-way in two areas, which is out of compliance with the FERC Plan, Section IV.A.1. The upland area where the soil had spilled was well vegetated and the soil could be easily retrieved without damage or loss. The Compliance Monitor informed the environmental inspection team of the issue. The issue was addressed with the contractor.
EV-6683	12/7/19	Mainline / North Spread / MP 111.00 to 113.00 / Carter County	Yes	The Compliance Monitor noted that multiple erosion control devices were in need of maintenance throughout the right-of-way segment. The Compliance Monitor did not observe any erosion issues. The Compliance Monitor also noted impounded water in a non-delineated drainage due to spoil blocking the channel. The Compliance Monitor informed the Lead EI of the erosion controls and drainage maintenance needs. The Lead EI stated that the issue would be addressed with the contractor.

**NONCOMPLIANCE REPORTS**

Noncompliance reports record an observation where an area or activity violates (is not in compliance with) the project specifications, results in damage to resources, or places sensitive resources at unnecessary risk. Three noncompliance reports were issued by the Compliance Monitors and/or compliance management team during this period, as detailed below.

SUMMARY OF NONCOMPLIANCE REPORTS FOR THE MIDSHIP PROJECT				
Report Number	Date Issued	Location (Spread or Facility/ Milepost [MP]/ County)	Follow-up Required (Yes or No)	Noncompliance Description
EV-6663	12/6/19	Chisholm Lateral / North Spread / MP 10.41 to 10.42 / Kingfisher County	No	The Compliance Monitor noted that a crew had placed a dewatering bag in a wetland and was dewatering in the wetland, which is out of compliance with section VI.B.4 of the FERC Procedures. The Compliance Monitor informed the crew of the issue and they immediately ceased dewatering. The Compliance Monitor informed the Lead EI of the issue and the lead EI also discussed the issue with the crew. The Compliance Monitor informed the Lead EI that a noncompliance report would be issued for the activity.
EV-6670	12/7/19	Mainline / North Spread / MP 86.69 to 87.07 / Stephens County	Yes	The Compliance Monitor noted that topsoil and subsoil piles were mixing in several locations, which is out of compliance with the FERC Plan, Section IV.B.4. The Compliance Monitor also noted that the stakes delineating the edge to the right-of-way were missing, which is out of compliance with the FERC Plan, Section II.B.3. The Compliance Monitor contacted the Lead EI to inform him of the issues.
EV-6680	12/7/19	Mainline / North Spread / MP 76.40 to 76.40 / Grady County	No	The Compliance Monitor had informed the EI of minor topsoil and subsoil separation issue on 11/29/2019, noting that the soil pile colors were very distinct from one another and soil separation could be achieved with little effort, . The Compliance Monitor re-inspected the area and noted that the piles had not been separated. The Compliance Monitor contacted the Lead EI to inform him that the issue had not been addressed. The Compliance Monitor informed the Lead EI that the failure of the EI to address the issue was out of compliance with the FERC Plan, Section II.B.2. The Compliance Monitor was subsequently informed that the two piles had been separated.

**PROBLEM AREA REPORTS**

Problem area reports record an observation where an area or activity does not meet the definition of acceptable but is not considered a noncompliance. Four problem area reports were issued by the Compliance Monitors during this period, as detailed below.

SUMMARY OF PROBLEM AREA REPORTS FOR THE MIDSHIP PROJECT				
Report Number	Date Issued	Location (Spread or Facility/ MP/ County)	Follow-up Required (Yes or No)	Problem Area Description
EV-6596	11/25/19	Mainline / North Spread / MP 80.34 to 81.09 / Garvin County	Yes	The Compliance Monitor noted that the topsoil and subsoil piles had started to mix at the toe of the piles. Per the FERC Plan, Section IV.B.4., the separation of salvaged topsoil and subsoil needs to be maintained throughout all construction activities. The Compliance Monitor relayed the issue to the Lead EI and the EI. The crew foreman was informed of the issue and began separating the topsoil while the Compliance Monitor was on site. The Compliance Monitor and the EI also discussed the need to proactively discuss the topsoil and subsoil compliance requirements with the crew and provide them with the different options available to prevent mixing.
EV-6602	11/26/19	Mainline / North Spread / MP 61.09 to 61.11 / Grady County	Yes	The Compliance Monitor conducted an inspection of a waterbody complex after the completion of the crossing activities and noted that two of the dry, non-flowing channels had not been properly restored and were obstructed by sheet pilings and soil. Per the FERC Procedures, Section V.C. the channels must be adequately restored after crossing activities are complete. The Compliance Monitor also noted several sediment control devices that required repair or replacement. The Compliance Monitor informed the EI of the issues. The EI and a contractor crew arrived onsite. The Compliance Monitor, the EI and the crew discussed the issues and the crew began restoring the channels.
EV-6628	11/30/19	Mainline / North Spread / MP 79.76 / Garvin County	Yes	The Compliance Monitor noted that several erosion control devices had failed during the most recent rain event, resulting in sediment flowing into the waterbody. Erosion Control devices were in place where required and functional prior to the rain event. The Compliance Monitor, the Lead EI, and the EI discussed the timing of the repairs as required by the FERC Plan, Section II.B.13.c, and 14.
EV-6630	11/30/19	Mainline / North Spread / MP 69.35 / Grady County	Yes	The Compliance Monitor noted that several erosion control devices had failed during the most recent rain event, resulting in sediment flowing into the waterbody. Erosion control devices were in place where required and functional prior to the rain event. The Compliance Monitor noted that an environmental crew was on site preparing the upcoming waterbody crossing. The onsite environmental crew was informed of the issue. The Compliance Monitor, the Lead EI, and the EI discussed the timing of the repairs as required by the FERC Plan, Section II.B.13.c, and 14.

**NONCOMPLIANCE REPORTS**

Noncompliance reports record an observation where an area or activity violates (is not in compliance with) the project specifications, results in damage to resources, or places sensitive resources at unnecessary risk. Two noncompliance reports were issued by the Compliance Monitors and/or compliance management team during this period, as detailed below.

SUMMARY OF NONCOMPLIANCE REPORTS FOR THE MIDSHIP PROJECT				
Report Number	Date Issued	Location (Spread or Facility/ Milepost [MP]/ County)	Follow-up Required (Yes or No)	Noncompliance Description
EV-6613	11/27/19	Mainline / North Spread / MP 67.31 to 68.88 / Grady County	Yes	The Compliance Monitor noted that two pieces of equipment had been parked overnight within the buffer zone of a waterbody. Per the FERC Procedures IV.A.1.d., all equipment will be parked overnight at least 100 feet from a waterbody. The Compliance Monitor also noted that two additional pieces of equipment were within the buffer zone of the waterbody without adequate secondary containment. Per the FERC Procedures IV.A.1.d., all equipment within the waterbody buffer zone shall have adequate secondary containment structures. The Compliance Monitor discussed the issues with the Lead EI and the EI. The EI subsequently informed the Compliance Monitor that two pieces of equipment had been moved out of the buffer zone and the remaining pieces of equipment would be removed before the end of the day.
EV-6629	11/30/19	Mainline / North Spread / MP 79.01 / Garvin County	No	The Compliance Monitor noted that multiple project related vehicles were parked off the right-of-way. Per the FERC Plan, Section IV.A.1., all project related activities are to be confined to the right-of-way. The Compliance Monitor informed the Lead EI that a noncompliance report would be issued. The vehicles were moved back onto the right-of-way and no disturbance to the area was noted.



PROBLEM AREA REPORTS

Problem area reports record an observation where an area or activity does not meet the definition of acceptable but is not considered a noncompliance. Two problem area reports were issued by the Compliance Monitors during this period, as detailed below.

SUMMARY OF PROBLEM AREA REPORTS FOR THE MIDSHIP PROJECT				
Report Number	Date Issued	Location (Spread or Facility/ MP/ County)	Follow-up Required (Yes or No)	Problem Area Description
EV-6560	11/20/19	Velma Lateral / North Spread / MP 13.20 to 13.30 / Garvin County	No	The Compliance Monitor noted that the erosion control device had not been keyed into an equipment bridge. The Compliance Monitor informed Lead EI that a problem area report would be issued for the failure to install erosion control devices across the entire width of the right-of-way at a waterbody as outlined in the FERC Procedures, Section V.B.10.a. Rain was in the immediate forecast for the area. The Compliance Monitor was subsequently informed by the Contractor that the erosion control device had been keyed into the equipment bridge.
EV-6581	11/23/19	Mainline / North Spread / MP 73.29 to 73.32 / Grady County	Yes	The Compliance Monitor noted that the topsoil and subsoil piles were not adequately separated as required per the FERC Plan IV.B.4. The crew began creating a gap between the piles during the inspection. No mixing of topsoil and subsoil was observed. The Compliance Monitor informed the Lead EI that a problem area report would be issued for failure to adequately separate topsoil and subsoil piles.



NONCOMPLIANCE REPORTS

Noncompliance reports record an observation where an area or activity violates (is not in compliance with) the project specifications, results in damage to resources, or places sensitive resources at unnecessary risk. Three noncompliance reports were issued by the Compliance Monitors and/or compliance management team during this period, as detailed below.

SUMMARY OF NONCOMPLIANCE REPORTS FOR THE MIDSHIP PROJECT				
Report Number	Date Issued	Location (Spread or Facility/ Milepost [MP]/ County)	Follow-up Required (Yes or No)	Noncompliance Description
EV-6532	11/18/19	Mainline / North Spread / MP 101.80 / Carter County	Yes	The Compliance Monitor conducted a follow-up inspection of the area where a problem area report (EV-6498 issued on 11/14/19) and a noncompliance report (EV-6528 issued on 11/15/19) were issued for the failure to maintain safe road conditions at a public roadway and noted that the rock from the road approach were still blocking the road ditch and in the roadway. The Compliance Monitor informed the Lead EI that a second noncompliance report would be issued for failure to remove the rock from the public roadway as outlined in the FERC Plan, Section IV.E.3.
EV-6533	11/18/19	Velma Lateral / North Spread / MP 13.20 / Canadian County	Yes	The Compliance Monitor observed that sediment-laden water from the right-of-way had flowed into an adjacent wheat field during nearby waterbody crossing activities. No erosion control devices had been installed to prevent the sediment from leaving the right-of-way. The Compliance Monitor informed the Lead EI that a noncompliance report would be issued for failure to install erosion control devices and allowing sediment to flow from the right-of-way as outlined in the FERC Plan, Section IV.F.3.a.
EV-6583	11/22/19	Mainline / South Spread / Bennington Meter Station / MP 199.60 / Bryan County	Yes	The Compliance Monitor conducted a follow-up inspection of the a meter station where two previous problem area reports (EV-5335 issued on 10/27/2019 and EV-6482 issued on 11/12/2019) were issued for failure to maintain erosion control devices as required per the FERC Plan Section IV.F. During this inspection, the Compliance Monitor noted that the some of the erosion control devices were not properly installed and other erosion control devices required maintenance. The Compliance Monitor also noted that sediment from the meter station was being tracked onto the public roadway and the culvert in the roadside ditch at the site entrance was collapsed. The Compliance Monitor informed the Lead EI of the issues and that a noncompliance report would be issued.



PROBLEM AREA REPORTS

Problem area reports record an observation where an area or activity does not meet the definition of acceptable but is not considered a noncompliance. Eight problem area reports were issued by the Compliance Monitors during this period, as detailed below.

SUMMARY OF PROBLEM AREA REPORTS FOR THE MIDSHIP PROJECT				
Report Number	Date Issued	Location (Spread or Facility/ MP/ County)	Follow-up Required (Yes or No)	Problem Area Description
EV-6468	11/11/19	Mainline / South Spread / Problem Area / 126.50 to 127.00 / Carter County	Yes	The Compliance Monitor observed bank erosion in several waterbodies from off right-of-way timber mats displaced during rainfall events in the spring and summer. The Compliance Monitor discussed the need to retrieve the timber mats with the Lead EI.
EV-6476	11/11/19	Mainline / North Spread / Problem Area / 68.70 / Grady County	Yes	The Compliance Monitor observed that the contractor did not install erosion control devices on the banks of a waterbody prior to returning the flow to the waterbody after the suspension of crossing activities. The Compliance Monitor and the EI discussed the issue and the EI addressed the issue with the contractor.
EV-6479	11/12/19	Mainline / North Spread / Problem Area / MP 106.50 / Carter County	Yes	The Compliance Monitor observed that the trench line was subsiding at a waterbody crossing. The Compliance Monitor and the EI discussed the need to restore the waterbody banks and channel to preconstruction contours. The EI stated he would address the issue with the contractor.
EV-6482	11/12/19	Mainline / South Spread / Bennington Meter Station / Problem Area / MP 199.60 / Bryan County	Yes	The Compliance Monitor observed that the erosion and sediment control devices at the Bennington Meter Station required maintenance or replacement. The issues were relayed to the environmental inspection team and the Chief Inspector. The Chief Inspector stated that the issues with the erosion and sediment control devices would be addressed.
EV-6486	11/13/19	Chisholm Lateral / North Spread / Problem Area / MP 5.90 / Kingfisher County	Yes	The Compliance Monitor noted that the erosion control devices on an equipment bridge over a non-flowing waterbody were damaged and a large amount of soil was present on the bridge. No upland sediment was observed in the waterbody. The Compliance Monitor discussed the issue with the EI.



Midcontinent Supply Header Interstate Pipeline Project, Docket No.: CP17-458-000
Environmental Compliance Monitoring Program
November 10 through 16, 2019 Summary Report

SUMMARY OF PROBLEM AREA REPORTS FOR THE MIDSHIP PROJECT

Report Number	Date Issued	Location (Spread or Facility/ MP/ County)	Follow-up Required (Yes or No)	Problem Area Description
EV-6498	11/14/19	Mainline / North Spread / Problem Area / MP 101.80 / Carter County	Yes	The Compliance Monitor observed that rocks had been left in the road ditch and within the road at a road crossing when the road approach was removed by the contractor. The Compliance Monitor informed the EI that problem area report would be issued for failure to remove the rock from the road ditches, road shoulders, and public roadway as outlined in the FERC Plan, Section IV.E.3., which states: Remove any soil or gravel spilled or tracked onto roadways daily or more frequent as necessary to maintain safe road conditions. The EI addressed the issue with the contractor.
EV-6515	11/15/19	Mainline / South Spread / MP 150.40 to 154.00 / Johnston County	Yes	The Compliance Monitor noted that multiple erosion control devices failed during the latest storm event, resulting in sediment entering multiple wetlands and waterbodies. Erosion control devices were properly installed and functional prior to the rain event. The Compliance Monitor informed the EI of the issues. The issues were relayed to the contractor.
EV-6525	11/16/19	Mainline / South Spread / Problem Area / MP 181.00 to 181.60 / Bryan County	Yes	The Compliance Monitor noted compaction and a lack of mulch in a seeded area. Per the FERC Plan, Section IV.F.4.a., mulch shall be applied concurrent with or immediately after seeding. The Compliance Monitor communicated the issues to the Lead EI.



View of off right-of-way timber mats in waterbody, South Spread, MP 127.00 (see EV-6468 issued on 11/11/19).



NONCOMPLIANCE REPORTS

Noncompliance reports record an observation where an area or activity violates (is not in compliance with) the project specifications, results in damage to resources, or places sensitive resources at unnecessary risk. Five noncompliance reports were issued by the Compliance Monitors and/or compliance management team during this period, as detailed below.

SUMMARY OF NONCOMPLIANCE REPORTS FOR THE MIDSHIP PROJECT				
Report Number	Date Issued	Location (Spread or Facility/ Milepost [MP]/ County)	Follow-up Required (Yes or No)	Noncompliance Description
EV-6469	11/11/19	Mainline / South Spread / MP 127.50 to 129.00 / Carter County	Yes	The Compliance Monitor observed subsoil and topsoil mixing during topsoil replacement and seeding and mulch application. The Compliance Monitor and the Lead EI discussed the issues and the Lead EI stated the issue would be addressed with the contractor.
EV-6496	11/13/19	Velma Lateral / North Spread / MP 0.16 / Stephens County	Yes	The Compliance Monitor conducted a follow-up inspection of an area where a problem area report (see EV-6440 issued on 11/6/19) was issued for the failure to remove construction debris and damaged erosion control devices from a meter station after restoration had been completed. The meter station is complete and restored and the surrounding area has been revegetated. The Compliance Monitor noted that the construction debris and damaged erosion control devices had not been removed from the area. The Compliance Monitor informed the EI that the issue had been elevated to a noncompliance.
EV-6497	11/13/19	Mainline / North Spread / MP 72.70 to 73.20 / Grady County	Yes	The Compliance Monitor conducted a follow-up inspection of an area where a problem area report (see EV- 6458 issued on 11/8/19) was issued for failure to install and maintain erosion control devices and noted that some of the issues had been addressed; however, some of the erosion control devices had not been reinstalled, resulting in sediment flowing off the right-of-way and entering a farm pond downslope of the right-of-way. The Compliance Monitor informed the EI that a noncompliance would be issued for the area.
EV-6512	11/15/19	Mainline / North Spread / MP 73.30 / Grady County	No	The Compliance Monitor conducted a follow-up inspection of an area where a noncompliance report (EV-6497 issued on 11/13/19) was issued for failure to install and maintain erosion control devices resulting in sediment flowing off the right-of-way and flowing into an off right-of-way pond. The Compliance Monitor noted that the erosion control devices had been reinstalled, the sediment returned to the right-of-way and the disturbed area had been reseeded. The area had been returned to compliance with the Project environmental requirements.
EV-6528	11/15/19	Mainline / North Spread / MP 101.80 /	Yes	The Compliance Monitor conducted a follow-up inspection of an area where a problem area report (EV- EV-6498 issued on 11/14/19) was issued for failure to remove the



Midcontinent Supply Header Interstate Pipeline Project, Docket No.: CP17-458-000
 Environmental Compliance Monitoring Program
 November 10 through 16, 2019 Summary Report

SUMMARY OF NONCOMPLIANCE REPORTS FOR THE MIDSHIP PROJECT

Report Number	Date Issued	Location (Spread or Facility/ Milepost [MP]/ County)	Follow-up Required (Yes or No)	Noncompliance Description
		Carter County		rock from the road approach from the public roadway and the roadside ditch creating unsafe road conditions. The Compliance Monitor noted that the rock from the road approach had not been removed from the public roadway and the roadside ditch. The Compliance Monitor informed the EI that problem area report would be elevated to a noncompliance report for failure to remove the rock from the public roadway as outlined in the FERC Plan, Section IV.E.3.



View of subsoil and topsoil mixing, South Spread, MP 127.5 to 129.0 (see EV-6469 issued on 11/11/19).



PROBLEM AREA REPORTS

Problem area reports record an observation where an area or activity does not meet the definition of acceptable but is not considered a noncompliance. Seven problem area reports were issued by the Compliance Monitors during this period, as detailed below.

SUMMARY OF PROBLEM AREA REPORTS FOR THE MIDSHIP PROJECT				
Report Number	Date Issued	Location (Spread or Facility/ MP/ County)	Follow-up Required (Yes or No)	Problem Area Description
EV-6413	11/4/19	Mainline/ North Spread/ MP 102.90/ Carter County	Yes	The Compliance Monitor noted that an equipment bridge over a non-flowing waterbody had shifted and caused damage to the geotextile fabric liner and side buffers. No sediment had entered the waterbody. The Compliance Monitor informed the EI that a problem area report would be issued for failure to maintain an equipment bridge as outlined in the FERC Procedures, Section, V.B.5.d.
EV-6422	11/5/19	Mainline/ South Spread/ MPs 128.20 to 129.40/ Carter County	Yes	The Compliance Monitor noted compaction and seedbed preparation issues during restoration activities. The Compliance Monitor informed the Lead EI that the activities were out of compliance with the FERC Plan specifications outlined in Sections V.C. and V.D.3.a, and a problem area report would be issued.
EV-6424	11/5/19	Mainline/ South Spread/ MPs 175.00 to 190.40/ Bryan County	Yes	The Compliance Monitor noted that the full topsoil depth was not segregated from the travel lane during the anomaly site access road construction as required by the FERC Plan, Section IV.B.3. No mixing of topsoil and subsoil was observed. The Compliance Monitor informed the environmental inspection team of the issue.
EV-6435	11/6/19	Mainline/ South Spread/ MPs 181.00 to 181.50/ Bryan County	Yes	The Compliance Monitor noted that upland sediment had been tracked onto the equipment bridges over two waterbodies during anomaly excavation activities. The bridges were not constructed with geotextile fabric liner and side rails to prevent the sediment from entering the waterbodies, out of compliance with the FERC Procedures V.B.5.b. The Compliance Monitor did not observe any sediment in the waterbodies. The Compliance Monitor informed the Lead EI of the observations and the need to remove the sediment from the bridges as well as the need to use geotextile fabric liner and side rails.
EV-6440	11/6/19	Velma Lateral/ Velma Meter Station North Spread/ MP 0.16/ Stephens County	Yes	The Compliance Monitor noted that construction debris remained outside the fence of the Velma Meter Station after the completion of the restoration activities, which is out of compliance with the FERC Plan, Section V.A.6. The Compliance Monitor informed the EI of the issuance of the problem area report. The Compliance Monitor and the EI discussed the need to address the debris removal activities with the contractor.



Midcontinent Supply Header Interstate Pipeline Project, Docket No.: CP17-458-000
 Environmental Compliance Monitoring Program
 November 03 through 09, 2019 Summary Report

SUMMARY OF PROBLEM AREA REPORTS FOR THE MIDSHIP PROJECT

Report Number	Date Issued	Location (Spread or Facility/ MP/ County)	Follow-up Required (Yes or No)	Problem Area Description
EV-6458	11/8/19	Mainline/ North Spread/ MPs 72.70 to 73.20/ Grady County	Yes	The Compliance Monitor noted multiple areas where erosion control devices were needed, numerous areas where the temporary erosion control devices needed to be maintained, and upland areas with sediment off the right-of-way, which is out of compliance with the FERC Plan, Section IV.F. The Compliance Monitor also noted that survey stakes which delineated the edge of the right-of-way were missing and needed to be replaced. The lack of survey staking is out of compliance with the FERC Plan, Section II.B.3. The Compliance Monitor discussed the issues with the EI. The EI stated the issues would be addressed with the contractor.
EV-6452	11/9/19	Mainline/ North Spread/ MPs 34.77 to 35.25/ Grady County	Yes	The Compliance Monitor noted multiple areas where the erosion control devices needed to be maintained, which is out of compliance with the FERC Plan, Section IV.F. The Compliance Monitor informed the Lead EI of the issues. The Lead EI stated he would contact the contractor to address the issue.



View of damaged geotextile and side buffers of an equipment bridge at a waterbody, North Spread, MP 102.90 (see EV-6413 issued on 11/4/19).



NONCOMPLIANCE REPORTS

Noncompliance reports record an observation where an area or activity violates (is not in compliance with) the project specifications, results in damage to resources, or places sensitive resources at unnecessary risk. One noncompliance report was issued by the Compliance Monitors and/or compliance management team during this period, as detailed below.

SUMMARY OF NONCOMPLIANCE REPORTS FOR THE MIDSHIP PROJECT				
Report Number	Date Issued	Location (Spread or Facility/ Milepost [MP]/ County)	Follow-up Required (Yes or No)	Noncompliance Description
EV-6457	11/8/19	Mainline/ North Spread/ MP 66.90/ Grady County	Yes	The Compliance Monitor noted that inadequate sediment and erosion control barriers had been installed at a waterbody, which is out of compliance with the FERC Procedures, Section V.B.10. The banks of the waterbody were previously cut down to the edge of the water. The crossing of the waterbody had not been initiated. The Compliance Monitor noted that after the most recent storm event, the water level of the waterbody rose and undermined a portion of the disturbed bank, causing erosion to the bank and allowing sediment to enter the waterbody. Temporary erosion control devices had been installed but were not adequate to prevent the erosion of the bank and sediment from entering the waterbody.



View of waterbody bank erosion resulting in sediment entering the waterbody due to inadequate erosion control devices, North Spread, MP 66.90 (see EV-6457 issued on 11/8/19).



PROBLEM AREA REPORTS

Problem area reports record an observation where an area or activity does not meet the definition of acceptable but is not considered a noncompliance. Nine problem area reports were issued by the Compliance Monitors during this period, as detailed below.

SUMMARY OF PROBLEM AREA REPORTS FOR THE MIDSHIP PROJECT				
Report Number	Date Issued	Location (Spread or Facility/ MP/ County)	Follow-up Required (Yes or No)	Problem Area Description
EV-5331	10/27/19	Mainline/ South Spread/ MPs 175.00 to 199.50/ Bryan County	Yes	The Compliance Monitor noted that the right-of-way boundaries were not staked at an anomaly dig site as required by the FERC Plan II.B.3. Construction activities appeared to be contained within the right-of-way boundaries. The Compliance Monitor discussed the need to stake the right-of-way with the Lead EI.
EV-5335	10/27/19	Mainline/ South Spread/ Bennington Meter Station MP 199.60/ Bryan County	Yes	The Compliance Monitor noted that trench spoil had been pushed up against the erosion control devices compromising the erosion control effectiveness and the road approaches had been overwhelmed with mud. The Compliance Monitor relayed the maintenance needs of the erosion control devices and the road approach to the Lead EI.
EV-5342	10/28/19	Mainline/ South Spread/ MPs 140.00 to 162.00/ Johnston County	Yes	The Compliance Monitor conducted an inspection of various cleaned up and restored areas of the right-of-way following a 4 to 6-inch rainfall event and noted areas of erosion and off right-of-way sediment deposition in both upland and wetlands and waterbodies. Erosion control devices had been properly installed prior to the rainfall event. The Compliance Monitor relayed the issues and their respective locations to the Lead EI.
EV-5364	10/30/19	Mainline/ South Spread/ MPs 119.00 to 149.00/ Johnston, Bryan Counties	Yes	The Compliance Monitor identified areas of trench subsidence and associated erosion near several waterbodies, erosion issues in recently restored upland areas, erosion control devices that required maintenance or replacement, and construction debris washed off the right-of-way after a 1.0-inch rainfall event. The Compliance Monitor relayed the issues and their respective locations to the Lead EI.
EV-5369	10/31/19	Mainline/ North Spread/ MPs 9.35 to 9.68/ Canadian County	Yes	The Compliance Monitor conducted a follow-up inspection of an area where the contractor had removed the erosion control devices around a waterbody and noted that erosion control devices had been installed on either side of the waterbody. The erosion control devices had not been tied into the equipment bridge leaving gaps through which sediment could enter the waterbody. In addition, the Compliance Monitor noted that upland sediment had been left on the bridge. No impact was noted to the waterbody and no rain was in the forecast. The Compliance Monitor discussed the issues with the Lead EI. The Lead EI stated the issues would be addressed with the contractor.



Midcontinent Supply Header Interstate Pipeline Project, Docket No.: CP17-458-000
Environmental Compliance Monitoring Program
October 27 through November 02, 2019 Summary Report

SUMMARY OF PROBLEM AREA REPORTS FOR THE MIDSHIP PROJECT

Report Number	Date Issued	Location (Spread or Facility/ MP/ County)	Follow-up Required (Yes or No)	Problem Area Description
EV-5373	10/31/19	Mainline/ South Spread/ MPs 181.70 to 181.80/ Bryan County	Yes	The Compliance Monitor noted that subsoil had been stockpiled on un-segregated topsoil during the excavation of an anomaly. The Compliance Monitor noted that the vegetation cover on the topsoil should allow the subsoil to be adequately separated from the topsoil. The Compliance Monitor informed the Lead EI of the problem. The Lead EI stated that crews would be reminded to maintain soils separation either by segregating topsoil or by utilizing a straw mulch barrier between the subsoil and the topsoil.
EV-5375	10/31/19	Mainline/ North Spread/ MPs 101.10 to 102.00/ Carter County	Yes	The Compliance Monitor noted that final grading, topsoil replacement, and installation of permanent erosion control devices had not been completed within 20 days of completion of backfilling activities, as required by the FERC Plan; Section V.A.1. The Compliance Monitor discussed the timeframe for completion of the final grading activities, topsoil replacement, and installation of permanent erosion control devices with the Lead EI. The Lead EI stated the timeframe for restoration efforts would be discussed with the contractor.
EV-5376	10/31/19	Mainline/ North Spread/ MP 101.80/ Carter County	Yes	The Compliance Monitor noted that the road approach rocks had migrated into the road ditch and were blocking the culverts, preventing water from flowing safely within the road ditches. Per the FERC Plan, Section IV.E.3., safe conditions are to be maintained at all road crossings. The Compliance Monitor discussed the issue with the Lead EI. The Lead EI informed the contractor of the need to remove the rocks blocking the culverts.
EV-6389	11/2/19	Mainline/ South Spread/ MPs 128.00 to 129.00/ Carter County	Yes	The Compliance Monitor noted that the erosion control devices required maintenance, repair, or replacement after the rainfall event the previous week. No impacts to sensitive resources had occurred. Per the FERC Plan Section II.B.13., temporary erosion control measures need to be maintained on a regular basis. The Compliance Monitor informed the Lead EI of the need to maintain the erosion control devices. The Lead EI addressed the issue with the contractor.



NONCOMPLIANCE REPORTS

Noncompliance reports record an observation where an area or activity violates (is not in compliance with) the project specifications, results in damage to resources, or places sensitive resources at unnecessary risk. Three noncompliance reports were issued by the Compliance Monitors and/or compliance management team during this period, as detailed below.

SUMMARY OF NONCOMPLIANCE REPORTS FOR THE MIDSHIP PROJECT				
Report Number	Date Issued	Location (Spread or Facility/ Milepost [MP]/ County)	Follow-up Required (Yes or No)	Noncompliance Description
EV-5343	10/28/19	Mainline/ South Spread/ MPs 125.00 to 140.00/ Carter, Johnston Counties	Yes	The Compliance Monitor noted that stormwater runoff had caused topsoil erosion and off right-of-way sediment deposition into several waterbodies and wetlands. All temporary erosion control devices had been removed during cleanup and seeding activities and were not replaced prior to the rain event, out of compliance with the FERC Plan Section IV. F. The Compliance Monitor and the Lead EI discussed the issues. The Lead EI stated she would address the issues with the contractor and ensure that the temporary erosion control devices were reinstalled.
EV-5344	10/28/19	Mainline/ North Spread/ MP 79.20/ Garvin County	Yes	The Compliance Monitor noted that a large volume of stormwater and sediment had flowed along the edge of an equipment bridge and entered a wetland and waterbody complex. Erosion control devices had not been installed at the wetland boundary and the wetland boundaries were not clearly staked or marked. The Compliance Monitor informed the Lead EI and the EI that a noncompliance report would be issued for failure to comply with the FERC Procedures; Section VI.B.3.a. and Section VI.A.4.
EV-6391	11/2/19	Mainline/ South Spread/ MPs 181.00 to 181.50/ Bryan County	Yes	The Compliance Monitor noted that while segregating topsoil for an anomaly dig, a piece of equipment bladed through a flowing waterbody. The activity was not compliant with FERC Procedures V.B.5. The Compliance Monitor informed the Lead EI of the incident and the issuance of the noncompliance report.



PROBLEM AREA REPORTS

Problem area reports record an observation where an area or activity does not meet the definition of acceptable but is not considered a noncompliance. One problem area reports were issued by the Compliance Monitors during this period, as detailed below.

SUMMARY OF PROBLEM AREA REPORTS FOR THE MIDSHIP PROJECT				
Report Number	Date Issued	Location (Spread or Facility/ MP/ County)	Follow-up Required (Yes or No)	Problem Area Description
EV-5302	10/22/19	Mainline/ North Spread/ MP 43.60/ Grady County	Yes	The Compliance Monitor noted that the sediment barriers were not properly tied into an equipment bridge at a waterbody. The Compliance Monitor informed the Lead EI and the EI that a problem area report would be issued for failure to install and maintain sediment barriers at a waterbody as outlined in the FERC Procedures, Section V.B.10.a. The EI stated he would address the issue with the contractor.



View of sediment barriers not extended across the entire width of an equipment bridge, North Spread, MP 43.60 (see EV-5302 issued on 10/22/19).



PROBLEM AREA REPORTS

Problem area reports record an observation where an area or activity does not meet the definition of acceptable but is not considered a noncompliance. Five problem area reports were issued by the Compliance Monitors during this period, as detailed below.

SUMMARY OF PROBLEM AREA REPORTS FOR THE MIDSHIP PROJECT				
Report Number	Date Issued	Location (Spread or Facility/ MP/ County)	Follow-up Required (Yes or No)	Problem Area Description
EV-5231	10/14/19	Mainline/ North Spread/ MPs 64.70 to 65.30/ Grady County	Yes	The Compliance Monitor and the Lead EI conducted a follow-up inspection of tract GR-0310-000 where a communication report (EV-5199 issued on 10/10/19) was filed to document a landowner complaint regarding open trenches, a cattle gap that was improperly installed (allowing cattle to escape from his pasture), and excess construction debris on the right-of-way. The Compliance Monitor noted that the cattle gap had been rebuilt to a satisfactory height, but the construction debris remained on the right-of-way. The Compliance Monitor informed the Lead EI that he would issue a problem area report for failure to remove the construction debris as outlined in the FERC Plan.
EV-5232	10/14/19	Mainline/ North Spread/ MP 66.60/ Grady County	No	The Compliance Monitor noted that the boundaries of a temporary access road had not been surveyed and properly identified with signs, stakes and survey flagging. The road crossed the right-of-way in several locations, but not all portions of the road were authorized for project use. The Compliance Monitor informed the Lead EI that a problem area report would be issued for failure to visibly mark and identify the temporary access road as outlined in the FERC Plan. Later in the day, the Compliance Monitor observed surveyors staking and marking the access road boundaries. The Lead EI stated that the "No Project Access" signs would be placed along the non-approved section of the road after the survey was complete.
EV-5246	10/15/19	Mainline/ North Spread/ MP 77.20/ Grady County	Yes	The Compliance Monitor noted rocks form a road approach in a public roadway. The Compliance Monitor informed the Lead EI that a problem area report would be issued for failure to maintain safe road conditions as outlined in the FERC Plan. The Lead EI later informed the Compliance Monitor that the contractor had been informed of the issue and the rock was scheduled to be removed from the road by the end of the day.
EV-5277	10/18/19	Velma Lateral / North Spread/ MP .020/ Stephens County	Yes	The Compliance Monitor noted that the required signage was not visible at a waterbody. The Compliance Monitor informed the Lead EI and the EI that a problem area report would be issued for failure to maintain the required signage at a waterbody as outlined in the FERC Plan.



Midcontinent Supply Header Interstate Pipeline Project, Docket No.: CP17-458-000
 Environmental Compliance Monitoring Program
 October 13 through 19, 2019 Summary Report

SUMMARY OF PROBLEM AREA REPORTS FOR THE MIDSHIP PROJECT

Report Number	Date Issued	Location (Spread or Facility/ MP/ County)	Follow-up Required (Yes or No)	Problem Area Description
EV-5281	10/19/19	Mainline/ North Spread/ MP 66.90/ Grady County	Yes	The Compliance Monitor noted that the required signage was not visible at a waterbody. The Compliance Monitor informed the Lead EI and the EI that a problem area report would be issued for failure to maintain the required signage at a waterbody as outlined in the FERC Plan.



View of construction debris left on the right-of-way, North Spread, MP 64.70 (see EV-5231 issued on 10/14/19).



NONCOMPLIANCE REPORTS

Noncompliance reports record an observation where an area or activity violates (is not in compliance with) the project specifications, results in damage to resources, or places sensitive resources at unnecessary risk. Four noncompliance reports were issued by the Compliance Monitors and/or compliance management team during this period, as detailed below.

SUMMARY OF NONCOMPLIANCE REPORTS FOR THE MIDSHIP PROJECT				
Report Number	Date Issued	Location (Spread or Facility/ Milepost [MP]/ County)	Follow-up Required (Yes or No)	Noncompliance Description
EV-5233	10/14/19	Mainline/ North Spread/ MP 66.60/ Grady County	No	The Compliance Monitor observed project related vehicles utilizing a non-approved portion of an access road. The road was lacking the required signage and survey staking (see EV-5232 issued on 10/14/19). The alignment sheets depict the portions of the access road that are approved for project use. The Compliance Monitor informed the Lead EI that a noncompliance report would be issued for operating outside of the approved workspace as outlined in the FERC Plan. The Lead EI subsequently informed the Compliance Monitor that the required signage had been installed on the unapproved sections of the road.
EV-5235	10/15/19	Mainline/ North Spread/ MP 46.44/ Grady County	Yes	The Compliance Monitor inspected a waterbody prior to the crossing activities and prior to the arrival of the crew and noted multiple compliance issues. The compliance issues included: equipment parked overnight within the waterbody buffer zone, erosion control devices not installed on the equipment bridge or along the waterbody, missing required environmental signage, damaged erosion control devices that needed repair or replacement, and upland soil on the equipment bridge. The Compliance Monitor informed the EI of the issues. The EI arrived on site and, upon the arrival of the crew, conducted a meeting reiterating the environmental project requirements. The Compliance Monitor also informed the Lead EI of the issuance of the noncompliance report.
EV-5267	10/17/19	Mainline/ North Spread/ MP 111.00/ Garvin County	No	The Compliance Monitor noted that two portable toilets had been placed off the right-of-way and due to high winds, one of the portable toilets had blown over. All fluids were contained within the portable toilet and had not reached the ground. The Compliance Monitor informed the Lead EI of the issue and that a noncompliance report would be issued for operating outside of the approved workspace as outlined in the FERC Plan. The EI subsequently informed the Compliance Monitor that the portable toilets had been moved back to within the right-of-way.
EV-5288	10/19/19	North Spread/ MPs 64.70 to 65.30/ Grady County	Yes	The Compliance Monitor conducted a follow-up inspection of tract GR-0310-000 where a communication report (EV-5199 issued on 10/10/19) and a problem area report (EV-5231 issued on 10/14/19) were filed to document a landowner complaint regarding excess construction debris on the right-of-way. The Compliance Monitor noted that all



Midcontinent Supply Header Interstate Pipeline Project, Docket No.: CP17-458-000
 Environmental Compliance Monitoring Program
 October 13 through 19, 2019 Summary Report

SUMMARY OF NONCOMPLIANCE REPORTS FOR THE MIDSHIP PROJECT

Report Number	Date Issued	Location (Spread or Facility/ Milepost [MP]/ County)	Follow-up Required (Yes or No)	Noncompliance Description
				trenching, lowering-in, tie-in and backfilling activities had been completed on this tract. The Compliance Monitor also noted that the construction debris had not been removed from the right-of-way. The Compliance Monitor informed the Lead EI and the EI that a noncompliance report would be issued for failure to remove the construction debris and trash as outlined in the FERC Plan.



View of crew utilizing unapproved road to access right-of-way, North spread, MP 66.60 (see EV-5233 issued on 10/14/19).



PROBLEM AREA REPORTS

Problem area reports record an observation where an area or activity does not meet the definition of acceptable but is not considered a noncompliance. Six problem area reports were issued by the Compliance Monitors during this period, as detailed below.

SUMMARY OF PROBLEM AREA REPORTS FOR THE MIDSHIP PROJECT				
Report Number	Date Issued	Location (Spread or Facility/ Milepost [MP]/ County)	Follow-up Required (Yes or No)	Problem Area Description
EV-5159	10/7/19	Mainline/ South Spread/ MPs 144.80 to 146.00/ Johnston County	Yes	The Compliance Monitor noted soil compaction with partial seed incorporation and straw mulch west of Mill Creek that was not crimped in as required. These issues were previously documented and communicated to the EI staff on October 4, 2019; however, limited corrective actions were taken to address the issues as of the end of this reporting period.
EV-5169	10/8/19	Mainline/ North Spread/ MP 63.30/ Grady County	No	The Compliance Monitor noted that the stream banks had been cut back to the high water mark well in advance of an upcoming waterbody crossing without adequately stabilizing the disturbed soil upslope of the waterbody, which allowed sediment to flow into the waterbody buffer. No sediment had entered the stream. The Lead EI was notified and an environmental crew was dispatched to the site to start addressing the issues. At the time of the Compliance Monitor's subsequent follow-up inspection, all issues had been resolved (see communication report EV-5184 dated October 9, 2019).
EV-5179	10/9/19	Mainline/ North Spread/ MPs 46.50 to 46.78/ Grady County	No	The Compliance Monitor noted sediment-laden water undermining a damaged dewatering structure during active dewatering activities, resulting in erosion on the right-of-way and sediment entering an off right-of-way vegetated area. The silt fence around the damaged dewatering structure was also undermined in two sections. The Lead EI and EI were notified, dewatering activities were halted to prevent sediment from entering the adjacent pond, and an environmental crew was promptly dispatched to the area to repair the dewatering structure and silt fence. Dewatering activities resumed when all repairs were completed. No sediment reached the adjacent pond or any sensitive environmental resource.



Midcontinent Supply Header Interstate Pipeline Project, Docket No.: CP17-458-000
 Environmental Compliance Monitoring Program
 October 6 through 12, 2019 Summary Report

SUMMARY OF PROBLEM AREA REPORTS FOR THE MIDSHIP PROJECT				
Report Number	Date Issued	Location (Spread or Facility/ Milepost [MP]/ County)	Follow-up Required (Yes or No)	Problem Area Description
EV-5185	10/9/19	Mainline/ North Spread/ MP 71.00/ Grady County	No	The Compliance Monitor noted a large area of disturbed and unstabilized soil on the south bank of a waterbody after topsoil removal and sheet pile installation on October 2, 2019 in advance of the upcoming waterbody crossing. In addition, damaged erosion control devices were noted at several locations. If not promptly addressed, the issues could result in sediment entering the waterbody due to the upcoming storm events in the forecast. No sediment appeared to have entered the waterbody at the time of the inspection. The Lead EI was notified of the issues at the site. At the time of the Compliance Monitor's subsequent follow-up inspection, all issues had been resolved (see communication report EV-5187 dated October 10, 2019).
EV-5218	10/11/19	Mainline/ North Spread/ MP 71.30/ Grady County	Yes	In response to previous landowner concerns regarding potential ponding of water within a landowner's hayfield, the Compliance Monitor conducted a follow-up inspection of tract GR-0338-000 following the recent rain events. No off right-of-way ponding of water had been observed during the Compliance Monitor's previous inspection of the property. However, following the recent rain events, ponding of water was noted behind a topsoil pile on the property. The Lead EI was notified and an environmental crew was dispatched to the location to install a gap in the topsoil pile to allow the water to drain from the hay field. The Compliance Monitor will return to the property to verify that the corrective measures improve stormwater drainage on the property.
EV-5209	10/12/19	Mainline/ South Spread/ MPs 156.00 to 196.00/ Johnston, Bryan Counties	Yes	The Compliance Monitor noted multiple areas of erosion on the previously restored right-of-way following rain events due to inadequately constructed slope breakers, inadequate straw mulch application, and lack of vegetation. Several of the areas had been previously documented. The EI team was informed. The Compliance Monitor will continue to monitor these areas.



NONCOMPLIANCE REPORTS

Noncompliance reports record an observation where an area or activity violates (is not in compliance with) the project specifications, results in damage to resources, or places sensitive resources at unnecessary risk. Three noncompliance reports were issued by the Compliance Monitors and/or compliance management team during this period, as detailed below.

SUMMARY OF NONCOMPLIANCE REPORTS FOR THE MIDSHIP PROJECT				
Report Number	Date Issued	Location (Spread or Facility/ Milepost [MP]/ County)	Follow-up Required (Yes or No)	Noncompliance Description
EV-5186	10/9/19	Mainline/ North Spread/ MP 66.90/ Grady County	Yes	The Compliance Monitor issued a noncompliance report to document large clods of dirt and sediment entering a flowing waterbody due to a failure to stabilize the disturbed soils upslope of a waterbody following stream bank/soil disturbance the previous day, which is out of compliance with section V.B of the FERC Procedures and section IV.F.3 of the Upland Erosion Control, Revegetation, and Maintenance Plan (Plan). The Compliance Monitor and Lead EI discussed the issues at the site, the Lead EI relayed the compliance concerns to the contractor, and an environmental crew began to install erosion control devices and remove the dirt clods and sediment from the waterbody. The Compliance Monitor will return to the site to verify that corrective measures have been completed.
EV-5219	10/11/19	Mainline/ North Spread/ MP 71.90/ Grady County	Yes	The Compliance Monitor issued a noncompliance report to document sediment entering a waterbody due to a failure to stabilize the streambanks and install temporary erosion control devices following initial ground disturbance associated with installation of sheet piling in preparation for a future waterbody crossing, which is out of compliance with section V.B of the FERC Procedures and section IV.F.3 of the FERC Plan. No date for the waterbody crossing had been scheduled at the time of the inspection. The Compliance Monitor and Lead EI discussed the issues at the site, and the Lead EI relayed the information to the contractor. The Compliance Monitor will return to the site to verify that corrective measures have been implemented.
EV-5210	10/12/19	Mainline/ South Spread/ MPs 156.80 to 156.90/ Johnston County	No	The Compliance Monitor issued a noncompliance report to document off right-of-way vehicle/equipment tracking during fence installation activities, which is out of compliance with section IV.A.1 of the FERC Plan and section V.B.5.a of the FERC Procedures. The Lead EI was notified of the issue.

**PROBLEM AREA REPORTS**

Problem area reports record an observation where an area or activity does not meet the definition of acceptable but is not considered a noncompliance. Five problem area reports were issued by the Compliance Monitors during this period, as detailed below.

SUMMARY OF PROBLEM AREA REPORTS FOR THE MIDSHIP PROJECT				
Report Number	Date Issued	Location (Spread or Facility/ MP/ County)	Follow-up Required (Yes or No)	Problem Area Description
EV-5064	9/30/19	Mainline/ North Spread/ MPs 64.20 to 64.40/ Grady County	Yes	The Compliance Monitor observed that the erosion control devices required maintenance or replacement. The Compliance Monitor informed the Lead EI of the issues. The Lead EI stated he would address the issue with the contractor.
EV-5065	9/30/19	Mainline/ North Spread/ MP 64.50/ Grady County	Yes	The Compliance Monitor observed an excessive amount of construction debris and trash piled on both sides of a roadway within the right-of-way that had been stockpiled for several weeks. The Compliance Monitor had previously informed the Lead EI of the need to begin the debris removal process and the Lead EI had spoken to the contractor about removing the debris in a timely manner. The Compliance Monitor informed the Lead EI that a problem area report would be issued for failure to remove the trash and debris. The Lead EI stated he would again address the issue with the contractor.
EV-5072	9/30/19	Mainline/ North Spread/ MP 35.35/ Grady County	No	The Compliance Monitor observed a dewatering bag rupture as she arrived onsite. The ruptured bag caused a large amount of water to drain out of the dewatering structure very quickly. The Compliance Monitor instructed the crew to cease the dewatering activities and informed the Lead EI of the issue. The Lead EI arrived on site and conducted an inspection with the Compliance Monitor. They noted that the silty water released from the dewatering structure did not reach the nearby waterbody. The Lead EI addressed the issue with the crew and reminded them that all dewatering activities were to be monitored continuously. The Compliance Monitor informed the Lead EI that a problem area report would be issued for the lack of proper monitoring of the dewatering activities.
EV-5129	10/4/19	Mainline/ South Spread/ MPs 140.80 to 143.70/ Johnston County	Yes	The Compliance Monitor noted that erosion control devices at several waterbodies were missing and one required repairs after being undermined during the last rain event several weeks ago. The Compliance Monitor communicated the issues to the EI. The EI addressed the issues with the contractor.

**SUMMARY OF PROBLEM AREA REPORTS FOR THE MIDSHIP PROJECT**

Report Number	Date Issued	Location (Spread or Facility/ MP/ County)	Follow-up Required (Yes or No)	Problem Area Description
EV-5147	10/4/19	Mainline/ North Spread/ MP 101.80 Carter County	Yes	The Compliance Monitor noted that construction debris was within a roadway and on the road shoulder. The Compliance Monitor discussed the issue with the Lead EI. The Lead EI subsequently informed the Compliance Monitor that the contractor had been informed of the issue and committed to removing the debris from the roadway by the end of the day.



View of an undermined silt fence resulting in sediment off the right-of-way in an upland area, North Spread, MP 64.20 (see EV-5064 issued on 9/30/19).

**NONCOMPLIANCE REPORTS**

Noncompliance reports record an observation where an area or activity violates (is not in compliance with) the project specifications, results in damage to resources, or places sensitive resources at unnecessary risk. Four noncompliance reports were issued by the Compliance Monitors and/or compliance management team during this period, as detailed below.

SUMMARY OF NONCOMPLIANCE REPORTS FOR THE MIDSHIP PROJECT				
Report Number	Date Issued	Location (Spread or Facility/ Milepost [MP]/ County)	Follow-up Required (Yes or No)	Noncompliance Description
EV-5060	9/29/19	Mainline/ North Spread/ MP 74.30/ Grady County	Yes	The Compliance Monitor observed that no erosion control devices had been installed at an area of disturbed upland soil adjacent to a wetland and sediment had entered the wetland. The Compliance Monitor informed the Lead EI of the noncompliance. The Lead EI stated he would address the issue with the contractor.
EV-5080	10/1/19	Mainline/ North Spread/ MP 74.00/ Grady County	Yes	The Compliance Monitor observed numerous erosion control device failures which allowed sediment to enter an off right-of-way pond. The Compliance Monitor also noted several erosion control devices in need of maintenance to remove the buildup of sediment. The Compliance Monitor informed the Lead EI of the issues. The Lead EI stated that he would address the issues with the contractor.
EV-5082	10/1/19	Mainline/ North Spread/ MP 59.05/ Grady County	Yes	The Compliance Monitor noted that a dewatering bag had been left unsealed and several other dewatering bags were not correctly connected to the hoses. The Compliance Monitor noted that a large amount of silt had drained from the bags, through the vegetation and into a waterbody. The Compliance Monitor instructed the crew to cease dewatering activities to prevent additional silt from draining into the waterbody. The silt was visible in the waterbody more than one hundred feet downstream from the right-of-way boundary. The foreman, environmental coordinator, lead environmental inspector were all informed of the issue. An environmental crew arrived on site and started addressing the issue.
EV-5115	10/2/19	Mainline/ North Spread/ MP 58.15/ Grady County	No	The Compliance Monitor noted multiple issues with the dewatering activities, including dewatering of trench silty water without a filter bag leading to silty water draining in an adjacent waterbody and connected pond and unmonitored dewatering activities. The Compliance Monitor discussed the issues with the Lead EI and the contractor environmental coordinator upon their arrival on site and informed them that a noncompliance would be issued. While the Compliance Monitor was on site, the contractor crew began removing the silt from the area and constructing a dewatering structure to add additional filtration to prevent silty water from reaching the adjacent waterbody and pond.



PROBLEM AREA REPORTS

Problem area reports record an observation where an area or activity does not meet the definition of acceptable but is not considered a noncompliance. Nine problem area reports were issued by the Compliance Monitors during this period, as detailed below.

SUMMARY OF PROBLEM AREA REPORTS FOR THE MIDSHIP PROJECT				
Report Number	Date Issued	Location (Spread or Facility/ MP/ County)	Follow-up Required (Yes or No)	Problem Area Description
EV-4966	9/22/19	Mainline/ South Spread/ MPs 155.50 to 162.00/ Johnston County	Yes	The Compliance Monitor inspected several areas of sandy soil after a rainfall event. The areas had been previously mulched and seeded. The Compliance Monitor noted erosion, erosion control device failure, off right-of-way sediment deposition, and wetland and waterbody impacts. Mulch had been applied in the amounts required in the FERC Upland Erosion Control, Revegetation, and Maintenance Plan. Due to the composition of the sandy soils and the high potential for erosion in the area, the Compliance Monitor had previously discussed the possibility that the application of additional mulch and alternative crimping techniques might be necessary with members of the environmental inspection team. The suggestions were not implemented. Contractor representatives were aware of the issues.
EV-4975	9/23/19	Mainline/ South Spread/ MPs 123.70 to 124.30/ Carter County	No	The Compliance Monitor noted that contractor crew vehicles were parked off right-of-way due to muddy conditions on the right-of-way. The crew immediately moved the vehicles to an approved access road. The Compliance Monitor did not observe any damage to the off right-of-way area from the vehicles.
EV-4980	9/23/19	Mainline/ North Spread/ MP 107.50 / Johnston County	Yes	The Compliance Monitor noted that the erosion control devices were not keyed into the corner of an equipment bridge. No sediment had entered into the waterbody at the time of the inspection. The Compliance Monitor discussed the issue with the EI, who subsequently addressed the issue with the contractor.
EV-4981	9/23/19	Mainline/ North Spread/ MP 68.70 / Grady County	Yes	The Compliance Monitor noted that the erosion control device on the bank of a waterbody was undermined and had allowed sediment to be deposited in the vegetated buffer of the waterbody. No sediment had entered into the waterbody at the time of the inspection. The Compliance Monitor discussed the issue with the EI, who subsequently addressed the issue with the contractor.
EV-4982	9/23/19	Mainline/ North Spread/ MP 61.80 / Grady County	Yes	The Compliance Monitor noted that an equipment bridge had shifted, causing damage to the geotextile fabric under-liner and side shields. No sediment had entered into the waterbody at the time of the inspection. The Compliance Monitor discussed the issue with the Lead EI, who subsequently addressed the issue with the contractor.



Midcontinent Supply Header Interstate Pipeline Project, Docket No.: CP17-458-000
 Environmental Compliance Monitoring Program
 September 22 through 28, 2019 Summary Report

SUMMARY OF PROBLEM AREA REPORTS FOR THE MIDSHIP PROJECT

Report Number	Date Issued	Location (Spread or Facility/ MP/ County)	Follow-up Required (Yes or No)	Problem Area Description
EV-4989	9/24/19	Mainline/ South Spread/ MP 199.60/ Bryan County	Yes	The Compliance Monitor observed that several erosion control devices required maintenance. The maintenance needs were communicated to the environmental inspection team and a contractor representative.
EV-5005	9/25/19	Mainline/ South Spread/ MPs 124.00 to 124.40/ Cater County	Yes	The Compliance Monitor observed that a portion of an equipment bridge was displaced during a recent rain event and portions of the bridge floated downstream and off the right-of-way. The Compliance Monitor informed the environmental inspection team that a problem area would be issued for failure to design and maintain each equipment bridge to withstand and pass the highest flow.
EV-5029	9/27/19	Mainline/ North Spread/ MPs 54.48 to 54.59 / Grady County	Yes	The Compliance Monitor noted that a dewatering filter bag had been placed on top of a used, full dewatering filter bag. The full dewatering filter bag had not been sealed, allowing some sediment from the bag to spill onto the right-of-way. The area where the bags had been placed was on the right-of-way, but in an area that had not been previously topsoiled. The mixing of topsoil and the sediment was minimal. The Compliance Monitor discussed the issue with the EI, who stated he would address the issue with the contractor.
EV-5056	9/27/19	Mainline/ North Spread/ MPs 60.20 to 62.30 / Grady County	Yes	The Compliance Monitor noted that numerous erosion control devices had failed during a recent rain event and sediment had been deposited off the right-of-way in an upland area. The Compliance Monitor informed the Lead EI that a problem area report would be issued. The Lead EI stated the issues would be addressed with the contractor.



NONCOMPLIANCE REPORTS

Noncompliance reports record an observation where an area or activity violates (is not in compliance with) the project specifications, results in damage to resources, or places sensitive resources at unnecessary risk. Three noncompliance reports were issued by the Compliance Monitors and/or compliance management team during this period, as detailed below.

SUMMARY OF NONCOMPLIANCE REPORTS FOR THE MIDSHIP PROJECT				
Report Number	Date Issued	Location (Spread or Facility/ Milepost [MP]/ County)	Follow-up Required (Yes or No)	Noncompliance Description
EV-4991	9/24/19	Mainline/ South Spread/ MPs 154.40 to 154.80 / Johnston County	Yes	The Compliance Monitor noted that the re-contoured right-of-way was not stabilized with mulch or erosion control devices along the edge of the right-of-way. Additionally, the Compliance Monitor noted that an erosion control device was installed incorrectly, resulting in erosion and sediment deposition to a waterbody. The Compliance Monitor discussed the issues with the EI. The issues were subsequently communicated to the contractor environmental foreman. The foreman responded that temporary erosion control devices would be installed pending the installation of the permanent erosion control devices.
EV-4996	9/24/19	Mainline/ North Spread/ MPs 74.70 to 74.80 / Grady County	Yes	The Compliance Monitor noted the erosion control devices had been undermined in several areas and sediment flowed into a waterbody during a rainfall event. The Compliance Monitor discussed the observations with the Lead EI and informed him of the issuance of a noncompliance for failure to maintain erosion control devices resulting in the deposition of sediment in a waterbody.
EV-5020	9/26/19	Mainline/ South Spread/ MPs 174.60 to 175.00/ Cater County	Yes	The Compliance Monitor noted that the secondary containment of a pump being used to fill the pipe for hydrostatic testing activities was compromised due to a collapsed side wall. Diesel fuel and water were present in the secondary containment but had not reached the ground. The Compliance Monitor informed the EI that a noncompliance would be issued for the operation of a pump within 100 feet of a waterbody without adequate secondary containment.



PROBLEM AREA REPORTS

Problem area reports record an observation where an area or activity does not meet the definition of acceptable but is not considered a noncompliance. Three problem area reports were issued by the Compliance Monitors during this period, as detailed below.

SUMMARY OF PROBLEM AREA REPORTS FOR THE MIDSHIP PROJECT				
Report Number	Date Issued	Location (Spread or Facility/ MP/ County)	Follow-up Required (Yes or No)	Problem Area Description
EV-4885	9/15/19	Mainline/ North Spread/ MP 71.90/ Grady County	Yes	The Compliance Monitor noted that clearing debris had not been removed from a waterbody bank. Clearing and grading activities had been completed within this section of right-of-way. The Compliance Monitor discussed the issue with the Lead EI. The Lead EI stated he would address the issue with the contractor.
EV-4886	9/16/19	Mainline/ North Spread/ MP 108.40/ Carter County	Yes	The Compliance Monitor noted that that a portion of an equipment bridge over a waterbody had been installed below the high-water mark. The Compliance Monitor discussed the issue with the Lead EI. The Lead EI stated he would address the issue with the contractor.
EV-4957	9/21/19	Mainline/ South Spread/ MPs 123.30 to 124.00/ Carter County	Yes	The Compliance Monitor noted that the segregated topsoil had been eroded and topsoil flowed off the right-of-way during a rain event. Topsoil had been stabilized prior to rain event. Additionally, the Compliance Monitor noted that the banks of a waterbody were eroded after the rain event. The banks had been properly stabilized prior to the rain event. The Compliance Monitor discussed the observations with the Lead EI. The Lead EI addressed the issues with the contractor.



NONCOMPLIANCE REPORTS

Noncompliance reports record an observation where an area or activity violates (is not in compliance with) the project specifications, results in damage to resources, or places sensitive resources at unnecessary risk. Two noncompliance reports were issued by the Compliance Monitors and/or compliance management team during this period, as detailed below.

SUMMARY OF NONCOMPLIANCE REPORTS FOR THE MIDSHIP PROJECT				
Report Number	Date Issued	Location (Spread or Facility/ Milepost [MP]/ County)	Follow-up Required (Yes or No)	Noncompliance Description
EV-4896	9/16/19	Mainline/ South Spread/ MPs 130.00 to 130.10/ Carter County	Yes	The Compliance Monitor issued a noncompliance report to document a dewatering pump adjacent to a wetland without secondary containment and wetland topsoil segregated for an excessive amount of time, both of which are out of compliance with the FERC Wetland and Waterbody Construction and Mitigation Procedures (Procedures). The Compliance Monitor discussed the issues with the Lead EI. The Lead EI stated that she would address the issues with the contractor.
EV-4972	9/21/19	Mainline/ North Spread/ MP 64.50/ Grady County	Yes	The Compliance Monitor noted that erosion control devices had not been maintained upslope of the roadway and sediment and rocks had been carried onto the roadway during an overnight rain event. The Compliance Monitor had previously issued problem area reports (see EV-4357 issued on 7/29/19 and EV-4690 issued on 8/27/19) at this site for erosion control device failures that allowed sediment and rock to flow onto the roadway. Additionally, at the same site, the Compliance Monitor noted that a different erosion control device was damaged and allowed sediment to flow off the right-of-way and enter an off right-of-way sensitive resource. Both observed issues were out of compliance with the FERC Upland Erosion Control, Revegetation, and Maintenance Plan (Plan). The Compliance Monitor discussed both issues with the Lead EI. The Lead EI stated that he would address the issues with the contractor.



PROBLEM AREA REPORTS

Problem area reports record an observation where an area or activity does not meet the definition of acceptable but is not considered a noncompliance. Two problem area reports were issued by the Compliance Monitors during this period, as detailed below.

SUMMARY OF PROBLEM AREA REPORTS FOR THE MIDSHIP PROJECT				
Report Number	Date Issued	Location (Spread or Facility/ MP/ County)	Follow-up Required (Yes or No)	Problem Area Description
EV-4858	9/12/19	Mainline/ North Spread/ MP 50.42/ Grady County	Yes	The Compliance Monitor noted that a waterbody had not been adequately restored after the completion of crossing activities. The stabilization material on the waterbody banks had not been properly installed. Rain was in the near term forecast. The Compliance Monitor also noted erosion on the bank, but could not determine when the erosion had occurred. Erosion control devices were in place and installed correctly to prevent sediment from reaching the waterbody. The Compliance Monitor discussed the issues that were observed with the EI and the environmental coordinator. The EI later informed the Compliance Monitor that the waterbody banks had been temporarily stabilized to ensure that the waterbody would be protected during the upcoming rain event.
EV-4873	9/14/19	Mainline/ South Spread/ MPs 199.50 to 199.60/ Bryan County	No	The Compliance Monitor noted multiple project related vehicles parked off the right-of-way. The Compliance Monitor informed the environmental inspection team of the issues. The contractor crew was informed of the problem and promptly moved the vehicles back on to the approved right-of-way. No damages to the off right-of-way area were noted.



NONCOMPLIANCE REPORTS

Noncompliance reports record an observation where an area or activity violates (is not in compliance with) the project specifications, results in damage to resources, or places sensitive resources at unnecessary risk. Five noncompliance reports were issued by the Compliance Monitors and/or compliance management team during this period, as detailed below.

SUMMARY OF NONCOMPLIANCE REPORTS FOR THE MIDSHIP PROJECT

Report Number	Date Issued	Location (Spread or Facility/ Milepost [MP]/ County)	Follow-up Required (Yes or No)	Noncompliance Description
EV-4851	9/11/19	Mainline/ South Spread/ MPs 143.00 to 143.10/ Johnston County	Yes	The Compliance Monitor observed a waterbody which was flowing, and the crossing area had been backfilled and partially restored. The Compliance Monitor noted that one bank was not restored or stabilized and a piece of equipment was within 100 feet of the waterbody without secondary containment. The environmental inspection team was informed of the issues. An environmental crew was nearby and the crew foreman indicated the bank would be restored and stabilized and the equipment would be removed from the area.
EV-4852	9/11/19	Mainline/ South Spread/ MPs 130.10 to 130.30/ Carter County	Yes	The Compliance Monitor noted that subsoil had been stockpiled on segregated topsoil on both sides of a waterbody for approximately 200 feet. The Compliance Monitor also noted that a piece of equipment was parked on the topsoil pile, potentially further mixing topsoil and subsoil. The Compliance Monitor discussed the issues with the Lead EI. The Lead EI stated that she would address the issues with the contractor.
EV-4874	9/14/19	Mainline/ South Spread/ MP 196.70/ Bryan County	Yes	The Compliance Monitor noted that subsoil had been stockpiled on segregated topsoil. The Compliance Monitor discussed the issue with the Lead EI. The Lead EI stated that she would address the issues with the contractor. An onsite foreman stated the soils would be re-separated.
EV-4875	9/14/19	Mainline/ South Spread/ MP 174.60/ Bryan County	Yes	The Compliance Monitor noted that a pump had been placed on plastic sheeting approximately 50 feet from the edge of a surface water source. The secondary containment was inadequate to contain any spills or leaks from the equipment. The Compliance Monitor informed the Lead EI and the on-site contractor representative who was responsible for the issue with the secondary containment. The Contractor representative stated he would address the issue with the crew.
EV-4879	9/14/19	Velma Lateral/ North Spread/ MPs 12.30 to 13.50/ Garvin County	Yes	The Compliance Monitor conducted a follow-up inspection of an area where a problem area report (see EV-4773 issued on 9/5/19) and a communication report (see EV-4816 issued on 9/7/19) were issued for failure to maintain erosion control devices. The Compliance Monitor noted that the erosion control devices had failed again and sediment had left the right-of-way. The Compliance Monitor did not notice any attempts to modify the erosion

Bill Risner et al BR-1002.000 MP 196.7



Midcontinent Supply Header Interstate Pipeline Project, Docket No.: CP17-458-000
 Environmental Compliance Monitoring Program
 September 8 through 14, 2019 Summary Report

SUMMARY OF NONCOMPLIANCE REPORTS FOR THE MIDSHIP PROJECT

Report Number	Date Issued	Location (Spread or Facility/ Milepost [MP]/ County)	Follow-up Required (Yes or No)	Noncompliance Description
				control devices to prevent future failures. The Compliance Monitor informed the Lead EI that a noncompliance report would be issued to document the ongoing and unresolved issues.



View of unrestored bank with water flow returned after the completion of the crossing activities, South Spread, MP 143.0 (see EV-4851 issued on 9/11/19)



PROBLEM AREA REPORTS

Problem area reports record an observation where an area or activity does not meet the definition of acceptable but is not considered a noncompliance. Three problem area reports were issued by the Compliance Monitors during this period, as detailed below.

SUMMARY OF PROBLEM AREA REPORTS FOR THE MIDSHIP PROJECT				
Report Number	Date Issued	Location (Spread or Facility/ MP/ County)	Follow-up Required (Yes or No)	Problem Area Description
EV-4773	9/5/19	Velma Lateral/ North Spread/ MPs 12.30 to 13.50 Garvin County	Yes	The Compliance Monitor noted multiple erosion control devices in need of repair or maintenance along a portion of the Velma Lateral. The Compliance Monitor informed the Lead EI a Problem Area Report would be issued as no rain was in the immediate forecast.
EV-4778	9/6/19	Mainline/ North Spread/ MP 60.20 Grady County	Yes	The Compliance Monitor observed rock from the road approaches that had been tracked onto a paved roadway. The Compliance Monitor and the Lead EI discussed the issue and the Lead EI stated he would address the issue with the contractor. The Lead EI subsequently informed the Compliance Monitor that a construction crew had been dispatched to address the debris within the roadway.
EV-4786	9/6/19	Mainline/ South Spread/ MPs 145.90 to 146.10/ Johnston County	Yes	The Compliance Monitor noted a disturbed bank of a waterbody without erosion controls after the installation of sheet pile shoring. Contractor crews were in the area, but no longer working at the waterbody. The Compliance Monitor informed the EI of the need to stabilize the bank and that a problem area report would be issued. The EI addressed the issue with the contractor.



NONCOMPLIANCE REPORTS

Noncompliance reports record an observation where an area or activity violates (is not in compliance with) the project specifications, results in damage to resources, or places sensitive resources at unnecessary risk. One noncompliance report was issued by the Compliance Monitors and/or compliance management team during this period, as detailed below.

SUMMARY OF NONCOMPLIANCE REPORTS FOR THE MIDSHIP PROJECT				
Report Number	Date Issued	Location (Spread or Facility/ Milepost [MP]/ County)	Follow-up Required (Yes or No)	Noncompliance Description
EV-4744	9/2/19	Mainline / South Spread / MP 169.70 to 169.90 / Johnston County	Yes	The Compliance Monitor observed that excess rock was being placed in the excavated trench above the bedrock profile. Rock disposal above the bedrock profile was previously observed (see communication report EV-4622 issued on 8/21/2019). At that time, Midship and the contractor were informed that the activity was not compliant with project environmental requirements. The Compliance Monitor discussed the observation of the non-compliant activity with the Lead EI. The Lead EI stated that she would address the issue with the contractor.



View of excess rock placed in the excavated trench above the bedrock profile, South Spread, MP 169.70 (see EV-4744 issued on 9/2/19).



PROBLEM AREA REPORTS

Problem area reports record an observation where an area or activity does not meet the definition of acceptable but is not considered a noncompliance. Four problem area reports were issued by the Compliance Monitors during this period, as detailed below.

SUMMARY OF PROBLEM AREA REPORTS FOR THE MIDSHIP PROJECT				
Report Number	Date Issued	Location (Spread or Facility/ MP/ County)	Follow-up Required (Yes or No)	Problem Area Description
EV-4668	8/26/19	Mainline/ North Spread/ MP 52.70/ Grady County	Yes	The Compliance Monitor noted that sediment from the right-of-way had accumulated on a bridge over a waterbody, but had not yet reached the waterbody. The Compliance Monitor and the Lead EI discussed the need to clean and repair the bridge prior to the forecasted rain event. The Lead EI stated he would address the issue with the contractor.
EV-4690	8/27/19	Mainline/ North Spread/ MP 64.50/ Grady County	No	The Compliance Monitor observed that sediment and rocks from the road approach had flowed onto the roadway during an overnight rain event. The Compliance Monitor noted that erosion control devices had not been installed upslope of the roadway. The Compliance Monitor discussed the issue with the Lead EI, and the Lead EI stated he would address the issue with the contractor. The Lead EI subsequently informed the Compliance Monitor that the sediment and rocks had been removed from the roadway and erosion control devices had been installed upslope of the roadway.
EV-4699	8/28/19	Mainline/ North Spread/ MP 74.80/ Grady County	Yes	The Compliance Monitor noted that insufficient erosion control devices had been installed on both sides of a waterbody. The small erosion control devices that were installed would provide little to no protection to the waterbody in the event of a large rain event. No sediment had entered the waterbody at the time of the inspection. The Compliance Monitor discussed the issue with the Lead EI, and the Lead EI stated he would address the issue with the contractor.
EV-4728	8/31/19	Mainline/ South Spread/ MPs 144.10 to 144.30/ Johnston County	Yes	The Compliance Monitor noted that the plate dam that extended across a portion of a waterbody caused some bank erosion during the elevated flow due to rainfall overnight. Due to thunderstorm activity, crossing activities were suspended the previous day and the partially installed plate had been left in the waterbody overnight. The Compliance Monitor discussed the erosion issue and the associated stabilization needs with the environmental inspection team. The contractor crew removed the plate dam to prevent any additional bank erosion prior to the continuation of the crossing activities.



NONCOMPLIANCE REPORTS

Noncompliance reports record an observation where an area or activity violates (is not in compliance with) the project specifications, results in damage to resources, or places sensitive resources at unnecessary risk. Two noncompliance reports were issued by the Compliance Monitors and/or compliance management team during this period, as detailed below.

SUMMARY OF NONCOMPLIANCE REPORTS FOR THE MIDSHIP PROJECT				
Report Number	Date Issued	Location (Spread or Facility/ Milepost [MP]/ County)	Follow-up Required (Yes or No)	Noncompliance Description
EV-4689	8/27/19	Mainline/ North Spread/ MP 68.70/ Grady County	Yes	The Compliance Monitor observed that the erosion control devices at a waterbody had been damaged by a piece of equipment and not repaired. As a result, sediment had flowed onto the equipment bridge and into the waterbody during an overnight rain event. Additionally, the disturbed waterbody bank was not stabilized, which also allowed sediment to enter the waterbody. The Compliance Monitor discussed the issues with the Lead EI. The Lead EI stated he would address the issue with the contractor.
EV-4726	8/30/19	Mainline/ South Spread/ MPs 198.00 to 199.00/ Bryan County	Yes	The Compliance Monitor observed subsoil spilled off the right-of-way in two locations. The Compliance Monitor also observed that no erosion control devices had been installed at the banks of a partially restored waterbody. The Compliance Monitor informed the environmental inspection team of the issues.



PROBLEM AREA REPORTS

Problem area reports record an observation where an area or activity does not meet the definition of acceptable but is not considered a noncompliance. Three problem area reports were issued by the Compliance Monitors during this period, as detailed below.

SUMMARY OF PROBLEM AREA REPORTS FOR THE MIDSHIP PROJECT				
Report Number	Date Issued	Location (Spread or Facility/ MP/ County)	Follow-up Required (Yes or No)	Problem Area Description
EV-4606	8/20/19	Mainline/ South Spread/ MPs 134.30 to 134.80/ Carter County	No	The Compliance Monitor noted that subsoil spilled approximately two feet off the right-of-way in two locations. The environmental inspection team and the contractor crew foreman were informed of the issue and the subsoil was promptly returned to the right-of-way with hand shovels.
EV-4607	8/20/19	Mainline/ South Spread/ MPs 144.80 to 145.50/ Johnston County	No	The Compliance Monitor observed project related vehicles parked outside the right-of-way boundaries. The environmental inspection team was informed of the issue. The vehicles were moved within the approved workspace following identification of the issue to the occupants. No damage was noted from the vehicles being parked off the right-of-way.
EV-4621	8/21/19	Mainline/ South Spread/ MPs 199.00 to 199.50/ Bryan County	No	The Compliance Monitor noted that subsoil was stockpiled against the segregated topsoil at three locations near a road crossing. The environmental inspection team and the contractor crew foreman were informed of the issue and the soils were promptly separated. No mixing or loss of topsoil occurred.



NONCOMPLIANCE REPORTS

Noncompliance reports record an observation where an area or activity violates (is not in compliance with) the project specifications, results in damage to resources, or places sensitive resources at unnecessary risk. One noncompliance reports were issued by the Compliance Monitors and/or compliance management team during this period, as detailed below.

SUMMARY OF NONCOMPLIANCE REPORTS FOR THE MIDSHIP PROJECT				
Report Number	Date Issued	Location (Spread or Facility/ Milepost [MP]/ County)	Follow-up Required (Yes or No)	Noncompliance Description
EV-4636	8/22/19	Mainline/ North Spread/ MP 119.10/ Carter County	Yes	The Compliance Monitor conducted a follow-up inspection of an area where a noncompliance report was issued for failure to stabilize topsoil piles (see EV-4581 issued on 8/16/19) and noted that the topsoil piles had not been stabilized. The Compliance Monitor informed the Lead EI that a second noncompliance report would be issued for failure to stabilize the topsoil piles within 24 hours of identification as outlined in the FERC Plan.



View of failure to stabilize topsoil piles within 24 hours of notification, North Spread, MP 119.10 (see EV-4636 issued on 8/22/19)

**PROBLEM AREA REPORTS**

Problem area reports record an observation where an area or activity does not meet the definition of acceptable but is not considered a noncompliance. Two problem area reports were issued by the Compliance Monitors during this period, as detailed below.

SUMMARY OF PROBLEM AREA REPORTS FOR THE MIDSHIP PROJECT				
Report Number	Date Issued	Location (Spread or Facility/ MP/ County)	Follow-up Required (Yes or No)	Problem Area Description
EV-4510	8/12/19	Mainline/ North Spread/ MP 17.51/ Canadian County	No	The Compliance Monitor observed that project related vehicles were parked on an un-topsoiled area and that the right-of-way boundary stakes were missing in the area. No rutting or mixing of topsoil and subsoil had occurred. The Compliance Monitor also observed that numerous trucks were parked on the road approach and the right-of-way was not accessible. The Compliance Monitor also observed that several vehicles were parked along the public road outside of the right-of-way boundaries. No rutting from the off right-of-way parking was noted. The Compliance Monitor and the Lead EI discussed the observed issues. The Compliance Monitor informed the Lead EI that as no damage to resources was noted, a problem area report would be issued. The Lead EI stated that he would address all the observed issues with the crews in the morning meeting.
EV-4582	8/16/19	Mainline/ North Spread/ NGPL 801 Meter Station / MP 119.10/ Carter County	Yes	The Compliance Monitor observed that the erosion control devices were not maintained and required repair or replacement. The Compliance Monitor and the Lead EI discussed the issues and the Lead EI stated he would address the issues with the contractor.



NONCOMPLIANCE REPORTS

Noncompliance reports record an observation where an area or activity violates (is not in compliance with) the project specifications, results in damage to resources, or places sensitive resources at unnecessary risk. One noncompliance report was issued by the Compliance Monitors and/or compliance management team during this period, as detailed below.

SUMMARY OF NONCOMPLIANCE REPORTS FOR THE MIDSHIP PROJECT				
Report Number	Date Issued	Location (Spread or Facility/ Milepost [MP]/ County)	Follow-up Required (Yes or No)	Noncompliance Description
EV-4581	8/16/19	Mainline/ North Spread/ NGPL 801 Meter Station / MP 119.10/ Carter County	Yes	The Compliance Monitor issued a noncompliance report to document wind and water erosion damage to the unprotected topsoil piles and the insufficient separation of subsoil and topsoil piles leading to the mixing of topsoil and subsoil. The Compliance Monitor and the Lead EI discussed the issue. The Lead EI stated he would address the issue with the contractor.



View of insufficient separation of subsoil and topsoil piles, North Spread, MP 119.10 (see EV-4581 issued on 8/16/19)

**PROBLEM AREA REPORTS**

Problem area reports record an observation where an area or activity does not meet the definition of acceptable but is not considered a noncompliance. Five problem area reports were issued by the Compliance Monitors during this period, as detailed below.

SUMMARY OF PROBLEM AREA REPORTS FOR THE MIDSHIP PROJECT				
Report Number	Date Issued	Location (Spread or Facility/ MP/ County)	Follow-up Required (Yes or No)	Problem Area Description
EV-4424	8/5/19	Mainline/ South Spread/ MP 150.30/ Johnston County	Yes	The crossing of a waterbody was blasted on 08/02/2019 and the banks were graded to facilitate the process. Following the blasting, the Compliance Monitor observed that sediment barriers at base of slope were not installed. Although a rainfall occurred on 08/03/2019, no sediment deposition was observed. The Compliance Monitor informed the EI that a problem area report would be issued. The EI indicated controls would be installed.
EV-4439	8/6/19	Mainline/ South Spread/ MPs 168.70 to 169.70/ Johnston County	No	The Compliance Monitor inspected tie-in activities at multiple, existing pipeline crossings. At one bell hole excavation, the Compliance Monitor observed that had spoil spilled against topsoil. The EI was informed a problem area report would be issued. Upon identification of the problem to the foreman, the material was promptly separated.
EV-4443	8/6/19	Mainline/ South Spread/ MPs 154.20 to 154.50/ Johnston County	Yes	The Compliance Monitor observed off right-of-way sediment deposition in a drainage ditch. Deposition occurred either during trench dewatering or following the 08/03/2019, rainfall event. Silt fence was previously installed in the drainage. The EI was informed a problem area report would be issued.
EV-4497	8/9/19	Mainline/ North Spread/ MP 45.60/ Grady County	Yes	The Compliance Monitor observed that a bridge runner had slipped off the support headers and was hanging directly over the waterbody. The Lead EI was informed that a problem area report would be issued for the failure to maintain an equipment bridge to withstand and pass the highest expected flow.
EV-4491	8/10/19	Chisholm Lateral/ North Spread/ MP 7.63/ Kingfisher County	Yes	The Compliance Monitor conducted a post rain event inspection of a waterbody crossing and observed some silt had drained onto the bridge and entered the waterbody. In addition, some of the erosion controls on the side of the right-of-way were overwhelmed leading to sediment off right-of-way. Erosion controls had been in place but were overwhelmed following the storm. The Compliance Monitor met with the Lead EI and the contractor's Environmental Coordinator to discuss the needed repairs.

**NONCOMPLIANCE REPORTS**

Noncompliance reports record an observation where an area or activity violates (is not in compliance with) the project specifications, results in damage to resources, or places sensitive resources at unnecessary risk. Three noncompliance reports were issued by the Compliance Monitors and/or compliance management team during this period, as detailed below.

SUMMARY OF NONCOMPLIANCE REPORTS FOR THE MIDSHIP PROJECT				
Report Number	Date Issued	Location (Spread or Facility/ Milepost [MP]/ County)	Follow-up Required (Yes or No)	Noncompliance Description
EV-4444	8/6/19	Mainline/ South Spread/ MPs 153.00 to 153.20/ Johnston County	Yes	During mainline excavation, the Compliance Monitor observed that subsoil had spilled off right-of-way at three separate locations. The Lead EI was informed that issue would be documented in a noncompliance report.
EV-4445	8/6/19	Mainline/ South Spread/ MPs 152.80 to 155.00/ Johnston County	Yes	The Compliance Monitor conducted a post rain event inspection between South Bullet Prairie Road and Golf Course Road and observed erosion controls associated with waterbody crossings were compromised following a rain event the past weekend on 08/03/2019, and due to livestock damage. Nine locations were observed requiring maintenance or repair of erosion controls. The Lead EI was informed a noncompliance report would be issued for failure to make timely repairs to erosion controls following a rain event.
EV-4447	8/6/19	Mainline/ North Spread/ MP 49.00/ Grady County	Yes	The Compliance Monitor observed topsoil mixing had occurred. Crews had removed a used filter bag and in doing so, damaged the silt fence protecting a topsoil pile leading to topsoil mixing with subsoil. The Lead EI was informed that a noncompliance report would be issued for the failure to maintain separation of salvaged topsoil and subsoil.

**PROBLEM AREA REPORTS**

Problem area reports record an observation where an area or activity does not meet the definition of acceptable but is not considered a noncompliance. Three problem area reports were issued by the Compliance Monitors during this period, as detailed below.

SUMMARY OF PROBLEM AREA REPORTS FOR THE MIDSHIP PROJECT				
Report Number	Date Issued	Location (Spread or Facility/ MP/ County)	Follow-up Required (Yes or No)	Problem Area Description
EV-4357	7/29/19	Mainline/ North Spread/ MP 64.50/ Grady County	Yes	The Compliance Monitor observed that rocks from the road approach had been tracked onto the paved roadway. The Compliance Monitor and the Lead EI discussed the issue. The Lead EI subsequently informed the Compliance Monitor that the Contractor had been informed of the issue and the rock would be removed from the public road by the end of the day.
EV-4413	8/3/19	Mainline/ North Spread/ MP 49.00/ Grady County	Yes	The Compliance Monitor noted that subsoil had overtopped the silt fence and was off right-of-way in an upland area. The Compliance Monitor informed the Lead EI of the issue.
EV-4414	8/3/19	Mainline/ North Spread/ MP 49.00/ Grady County	Yes	The Compliance Monitor observed food garbage and debris scattered along the right-of-way. The Compliance Monitor and the Lead EI discussed the issue and the Lead EI informed the Contractor of the issue.



View of rock from road approach left on a paved road, North Spread, MP 64.50 (see EV-4357 issued on 7/29/19)

**NONCOMPLIANCE REPORTS**

Noncompliance reports record an observation where an area or activity violates (is not in compliance with) the project specifications, results in damage to resources, or places sensitive resources at unnecessary risk. Two noncompliance reports were issued by the Compliance Monitors and/or compliance management team during this period, as detailed below.

First National Bank
GR-0310.000
MP 65.3

SUMMARY OF NONCOMPLIANCE REPORTS FOR THE MIDSHIP PROJECT				
Report Number	Date Issued	Location (Spread or Facility/ Milepost [MP]/ County)	Follow-up Required (Yes or No)	Noncompliance Description
EV-4358	7/29/19	Mainline/ North Spread/ MP 65.30/ Grady County	Yes	The Compliance Monitor observed a diesel fuel leak from a pump. Absorbent materials had been placed in the secondary containment in an effort to control the leak. The diesel fuel had leaked from the plastic onto the right-of-way. No cleanup efforts had made to remove the contaminated soil. The Compliance Monitor discussed the issue with the Lead EI, who subsequently informed the Contractor of the leak and the needed clean-up activities.
EV-4366	7/30/19	Mainline/ South Spread/ MPs 166.80 to 167.00/ Johnston County	Yes	The Compliance Monitor noted that subsoil had been pushed up against a segregated topsoil pile. The Compliance Monitor and the Lead EI discussed the issue and the EI notified the Contractor of the issue.

**PROBLEM AREA REPORTS**

Problem area reports record an observation where an area or activity does not meet the definition of acceptable but is not considered a noncompliance. Five problem area reports were issued by the Compliance Monitors during this period, as detailed below.

SUMMARY OF PROBLEM AREA REPORTS FOR THE MIDSHIP PROJECT				
Report Number	Date Issued	Location (Spread or Facility/ MP/ County)	Follow-up Required (Yes or No)	Problem Area Description
EV-4246	7/22/19	Mainline/ North Spread/ MP 30.70/ Grady County	Yes	The Compliance Monitor conducted an inspection of an equipment bridge near MP 30.7 and observed that the sideboards on the equipment bridge had been damaged. No sediment had entered the waterbody at this time. The Compliance Monitor also observed that erosion controls at the southeast corner of the bridge were not keyed into the equipment bridge. The Lead EI was informed that a problem area report would be issued for the failure to adequately install erosion controls and failure to maintain the equipment bridge.
EV-4247	7/22/19	Mainline/ North Spread/ MP 56.70/ Grady County	Yes	The Compliance Monitor conducted an inspection at MP 56.7 and observed that the erosion controls behind a topsoil pile were not maintained. The silt fence was undermined and torn, trapped sediment needed to be removed from the silt fence, and sediment had also migrated off right-of-way into an upland area. The Lead EI was informed that a problem area report would be issued for the failure to maintain erosion controls.
EV-4259	7/22/19	Mainline/ South Spread/ MPs 178.60 to 179.30/ Bryan County	Yes	The Compliance Monitor conducted an inspection of tie-in activities between U.S. Highway 69/75 and Hat Powell Road and observed that subsoil spoil was stockpiled against segregated topsoil for a distance of 25 feet up to a height of 2 feet. In addition, pipe weld coating drips to the ground were present at five locations. The environmental team was informed of the issue. The foreman was subsequently informed of the issue and indicated soils would be separated, coating drips would be recovered, and that future coating drips would be contained.
EV-4267	7/23/19	Mainline/ North Spread/ MP 23.10/ Canadian County	No	The Compliance Monitor conducted an inspection of waterbody crossing activities at MP 23.1 where trench dewatering activities were in progress. The Compliance Monitor observed that the hose from the dewatering pump was not attached to the filter bag and sediment had been deposited off right-of-way. The Compliance Monitor contacted the EI who subsequently shut down the dewatering activities. The compliance issues were corrected while the Compliance Monitor was on site.

Misty Tally & Maria Childers
BR-0903.000
BR-0904.000
MP 178.7-179.3



Midcontinent Supply Header Interstate Pipeline Project, Docket No.: CP17-458-000
 Environmental Compliance Monitoring Program
 July 21 through 27, 2019 Summary Report

SUMMARY OF PROBLEM AREA REPORTS FOR THE MIDSHIP PROJECT

Report Number	Date Issued	Location (Spread or Facility/ MP/ County)	Follow-up Required (Yes or No)	Problem Area Description
EV-4343	7/27/19	Mainline/ North Spread/ MP 50.40/ Grady County	Yes	The Compliance Monitor conducted an inspection of an equipment bridge at MP 50.4 and observed that the erosion controls at the northeast corner of the bridge were not keyed into the bridge. In addition, the south stream bank, which had been disturbed during sheet pile installation, had not been stabilized. The Compliance Monitor informed the Lead EI that a problem area report would be issued for the inadequate erosion controls at the bridge and the failure to install a sediment barrier on the stream bank immediately after initial disturbance.

**NONCOMPLIANCE REPORTS**

Noncompliance reports record an observation where an area or activity violates (is not in compliance with) the project specifications, results in damage to resources, or places sensitive resources at unnecessary risk. Four noncompliance reports were issued by the Compliance Monitors and/or compliance management team during this period, as detailed below.

SUMMARY OF NONCOMPLIANCE REPORTS FOR THE MIDSHIP PROJECT				
Report Number	Date Issued	Location (Spread or Facility/ Milepost [MP]/ County)	Follow-up Required (Yes or No)	Noncompliance Description
EV-4244	7/22/19	Mainline/ North Spread/ MPs 55.90 to 56.70/ Grady County	Yes	The Compliance Monitor conducted an inspection of topsoil piles between MPs 55.9 and 56.7, and observed severe wind and water erosion of the segregated topsoil piles. Seed had been broadcast along the topsoil piles in an attempt to stabilize the piles; however, the wind had blown most of the seed into the erosion rills and onto the lower portions of the topsoil piles. No seed germination was observed. The Compliance Monitor informed the Lead EI that a noncompliance report would be issued for failure to stabilize the segregated topsoil piles.
EV-4248	7/22/19	Mainline/ North Spread/ MP 56.70/ Grady County	Yes	During an inspection at MP 56.7, the Compliance Monitor observed a water truck exit the right-of-way onto a private unapproved gravel road. There was a hand written "No Access Road" sign posted at this road crossing. The Compliance Monitor informed the Lead EI that a noncompliance report would be issued for activities outside of the approved workspace. The Lead EI responded saying that the contractor will be informed of the unauthorized use of this road.
EV-4249	7/22/19	Mainline/ North Spread/ MPs 56.20 to 56.30/ Grady County	Yes	During an inspection at MP 55.6 the Compliance Monitor observed that heavy equipment had tracked onto the unprotected segregated topsoil piles resulting in topsoil mixing. The Compliance Monitor informed the Lead EI that a noncompliance report would be issued for the failure maintain separation of salvaged topsoil and subsoil.
EV-4312	7/25/19	Mainline/ North Spread/ MP 30.70/ Grady County	Yes	During an inspection at MP 30.7, the Compliance Monitor observed a large volume of rock mixed into the recently cleaned up section of right-of-way, which is a wheat field. This location was the site of a water conveyance device consisting of geotextile fabric and rock used to direct water across the right-of-way. The Compliance Monitor met with the Lead EI on site and both concluded that the rock and geotextile fabric had been buried on the right-of-way instead of being removed. The Lead EI notified the contractor of the issue and a track hoe was dispatched to the location. Additional rock was uncovered by the trackhoe. The contractor stated that a crew with a special rock bucket would be brought to the site and the rock and geotextile fabric would be removed from the right-of-way. The Compliance Monitor informed the Lead EI that a



Midcontinent Supply Header Interstate Pipeline Project, Docket No.: CP17-458-000
Environmental Compliance Monitoring Program
July 21 through 27, 2019 Summary Report

SUMMARY OF NONCOMPLIANCE REPORTS FOR THE MIDSHIP PROJECT				
Report Number	Date Issued	Location (Spread or Facility/ Milepost [MP]/ County)	Follow-up Required (Yes or No)	Noncompliance Description
				noncompliance report would be issued for the failure to properly dispose of construction debris.

**PROBLEM AREA REPORTS**

Problem area reports record an observation where an area or activity does not meet the definition of acceptable but is not considered a noncompliance. Five problem area reports were issued by the Compliance Monitors during this period, as detailed below.

SUMMARY OF PROBLEM AREA REPORTS FOR THE MIDSHIP PROJECT

Report Number	Date Issued	Location (Spread or Facility/ MP/ County)	Follow-up Required (Yes or No)	Problem Area Description
EV-4142 Chris Davis BR-0967.000 MP 190-190.2	7/14/19	Mainline/ South Spread/ MP 190.20/ Bryan County	Yes	The Compliance Monitor conducted an inspection of tract BR-0967.000, where a formal complaint had been made regarding sediment entering a pond. The Compliance Monitor observed that the silt fence installed to protect the off right-of-way pond was in need of repair and off right-of-way sediment deposition was observed in drainage areas leading to the pond. The Lead EI was informed of the issue.
EV-4199 Chris & Janice McComas GR-0137.010 35.85-36.45	7/18/19	Mainline/ North Spread/ MP 36.40/ Grady County	Yes	The Compliance Monitor conducted an inspection of the State Highway 81 crossing (MP 36.4) and observed that the erosion controls were in need of maintenance. Accumulated sediment had not been removed from the silt fence as required to maintain the functionality of the controls. The Lead EI and EI were informed of the maintenance issues.
EV-4201 Terry Luber CL-KI-0065.000 CL-KI-0067.000 MP 15.73-16.48	7/18/19	Chisholm Lateral/ North Spread/ MPs 15.73 to 16.48/ Kingfisher County	Yes	The Compliance Monitor met with the landowner of two condemnation tracts (CL-KI-0065.000 and CL-KI-0067.000) on the Chisholm Lateral. The landowner relayed the following concerns: <ul style="list-style-type: none"> - The western bank of a flowing waterbody crossing is located in the bend of the river and has a 25- to 30-foot vertical drop. The landowner was concerned that disturbing the area will most likely compromise the stability of the entire bend and restoration will be extremely difficult to achieve. The contractor was investigating a change of crossing method to avoid or limit disturbance of the bank. - The landowner indicated he had to dam a section of his property adjacent to the right-of-way to prevent sediment from the right-of-way from draining into his pond. The Compliance Monitor observed that the project erosion controls required maintenance and informed the EI of the needed maintenance. - Several felled trees were moved downstream during large rain events, damaging the landowner's and his neighbor's fence. Midship stated that this is a condemnation tract and that it has not received permission to retrieve off right-of-way materials. - The landowner indicated that because of a lack of gaps in the topsoil piles, stormwater was unable to drain off the property as it had been doing preconstruction. As a result, two sections of the adjacent wheat field remained flooded. - A topsoil pile and the road ditch adjacent to the landowner's wheat field were seeded with annual ryegrass last week. The landowner expressed extreme concern about the spread of the annual ryegrass into his wheat field.



SUMMARY OF PROBLEM AREA REPORTS FOR THE MIDSHIP PROJECT				
Report Number	Date Issued	Location (Spread or Facility/ MP/ County)	Follow-up Required (Yes or No)	Problem Area Description
				<ul style="list-style-type: none">- The landowner was concerned that the right-of-way was not well marked resulting in crews going beyond the approved boundaries. The Compliance Monitor informed the EI of the need to replace the flagging.- The landowner relayed his concerns regarding severe erosion in some places and the loss of topsoil. This issue had been previously throughout the Northern Spread and the Chisholm Lateral, and Midship is developing a plan to protect topsoil piles and to address the loss of topsoil. <p>The Compliance Monitor informed the landowner that his concerns had been documented, would be relayed to FERC, and that he would be notified which creek crossing method would be used. The Compliance Monitor informed the EI that a problem area report would be issued for the lack of staking and the erosion controls in need of repair/ maintenance.</p>
EV-4215	7/19/19	Mainline/ North Spread/ MP 56.80/ Grady County	Yes	The Compliance Monitor conducted an inspection of a waterbody at MP 56.8 and observed that the erosion controls at the northwest corner of the equipment bridge were not maintained, sediment buildup had not been removed from the silt fence, and the silt fence had been undermined. The Lead EI was informed that a problem area report would be issued for the lack of erosion control maintenance.
EV-4232	7/19/19	Chisholm Lateral/ North Spread/ MPs 16.36 to 17.86/ Kingfisher County	No	The Compliance Monitor inspected grading activities between MPs 16.36 and 17.86 where a road intersects with the right-of-way. The road had not been approved for project use and the Compliance Monitor observed several project vehicles using the road. The Lead EI was informed of the issue. The Lead EI informed the foreman who said that he had received permission to use the road by Midship's Chief Inspector. The Compliance Monitor informed the Lead EI that because the crew was acting in good faith, "no access" signs were immediately installed, and no impact on the road was noted that this would be documented as a problem area.

**PROBLEM AREA REPORTS**

Problem area reports record an observation where an area or activity does not meet the definition of acceptable but is not considered a noncompliance. Six problem area reports were issued by the Compliance Monitors during this period, as detailed below.

SUMMARY OF PROBLEM AREA REPORTS FOR THE MIDSHIP PROJECT				
Report Number	Date Issued	Location (Spread or Facility/ MP/ County)	Follow-up Required (Yes or No)	Problem Area Description
EV-4079	7/9/19	Mainline/ South Spread/ MPs 180.90 to 181.80/ Bryan County	Yes	The Compliance Monitor noted that the geotextile fabric used on the bridge over waterbody SBR-007 required maintenance, which could potentially lead to sediment entering the waterbody if not addressed. The issue was communicated to the Lead EI.
EV-4099	7/10/19	Mainline/ North Spread/ MP 28.70/ Grady County	Yes	The Compliance Monitor noted that the erosion control devices at the northeast and southeast corners of the equipment bridge over waterbody SGR-111 were not keyed into the bridge, leaving gaps that could potentially allow sediment to flow into the waterbody. No sediment had entered into the waterbody at the time of the inspection. The Lead EI was informed that a problem area report would be issued for inadequate erosion control devices.
EV-4115	7/12/19	Mainline/ North Spread/ MPs 3.79 to 4.48/ Canadian County	No	<p>The Compliance Monitor and Lead EI observed a crew constructing off-right-of-way dewatering structures intended to discharge water from a well-point dewatering system and noted the following issues:</p> <ul style="list-style-type: none">- The EI was not consulted, as per the project requirements, regarding the dewatering activities, the need for dewatering structures, and the location of structures.- The structures were not required because the well-point water was clear and filter bags could be used without causing any sedimentation issues.- It was unclear if the landowner's permission had been acquired.- The crews were instructed by the Environmental Consultant to install the structures 120 feet off the right-of-way. Because the entire area is a well-vegetated upland, it was unclear why the structures were located so far from the right-of-way.- The crew was not informed that the Environmental Consultant was not the EI responsible for the area. <p>The Lead EI reminded the on-site crew to contact the EI prior to conducting dewatering activities. The Environmental Consultant was also reminded that the EI is first point of contact for the crew for these activities. The crews retrieved the large amount of straw bales placed off right-of-way. The Compliance Monitor was later contacted by the EI responsible for the area. The EI stated that he had gone to the site and addressed all issues. Filter bags were installed</p>



Midcontinent Supply Header Interstate Pipeline Project, Docket No.: CP17-458-000
 Environmental Compliance Monitoring Program
 July 07 through 13, 2019 Summary Report

SUMMARY OF PROBLEM AREA REPORTS FOR THE MIDSHIP PROJECT				
Report Number	Date Issued	Location (Spread or Facility/ MP/ County)	Follow-up Required (Yes or No)	Problem Area Description
				just off the right-of-way on geotextile fabric to prevent any potential erosion issues.
EV-4121	7/12/19	Mainline/ South Spread / MPs 182.60 to 182.90/ Bryan County	Yes	The Compliance Monitor noted that the previously installed silt fence had become overwhelmed with saturated spoil and mud had flowed up to 50 feet off right-of-way and entered a drainage east of Windswept Trail. The issue was communicated to the Lead EI who indicated that the material would be returned to the right-of-way and additional erosion control devices would be installed. No sensitive resources were affected.
EV-4138	7/13/19	Mainline/ North Spread/ MP 41.10/ Grady County	Yes	The Compliance Monitor noted that temporary erosion control devices had not been installed immediately upslope of waterbody SGR-051 as required at the waterbody crossing site. No rain was in the immediate forecast. The Lead EI was informed that a problem area report would be issued for failure to install sediment barriers across the entire right-of-way at the waterbody crossing. The Lead EI said he would inform the contractor and the necessary corrections would be made.
EV-4140	7/13/19	Mainline/ North Spread/ MP 30.70/ Grady County	Yes	The Compliance Monitor noted that both the north and south stream banks had not been restored to preconstruction contours following the crossing of waterbody SGR-029. The Compliance Monitor subsequently met with the Lead EI on site who concurred that the stream banks had not been restored to preconstruction contours. The Lead EI stated that the contractor would be informed of the compliance issue and the necessary corrections would be made.

**NONCOMPLIANCE REPORTS**

Noncompliance reports record an observation where an area or activity violates (is not in compliance with) the project specifications, results in damage to resources, or places sensitive resources at unnecessary risk. Two noncompliance reports were issued by the Compliance Monitors and/or compliance management team during this period, as detailed below.

SUMMARY OF NONCOMPLIANCE REPORTS FOR THE MIDSHIP PROJECT				
Report Number	Date Issued	Location (Spread or Facility/ Milepost [MP]/ County)	Follow-up Required (Yes or No)	Noncompliance Description
EV-4068	7/8/19	Mainline/ North Spread/ MPs 48.70 to 48.80/ Grady County	No	During the inspection of two proposed additional temporary workspaces (ATWS) that were the subject of a pending variance request still under review, the Compliance Monitor observed that the both unapproved ATWSs had already been graded and the topsoil stockpiled. The Lead EI was informed that a noncompliance report would be issued to document use of the unapproved areas.
EV-4109	7/11/19	Mainline/ North Spread/ MP 49.00/ Grady County	No	The Compliance Monitor observed that a portable toilet and construction debris had been placed outside the approved workspace near temporary access road 23. The Lead EI was informed that a noncompliance report would be issued to document use of the unapproved areas. At the time of the Compliance Monitor's follow-up inspection the following day, the portable toilet had been returned to the approved workspace and the construction debris had been removed (see communication report EV-4118, dated July 12, 2019).

**PROBLEM AREA REPORTS**

Problem area reports record an observation where an area or activity does not meet the definition of acceptable but is not considered a noncompliance. Fifteen problem area reports were issued by the Compliance Monitors during this period, as detailed below.

SUMMARY OF PROBLEM AREA REPORTS FOR THE MIDSHIP PROJECT				
Report Number	Date Issued	Location (Spread or Facility/ MP/ County)	Follow-up Required (Yes or No)	Problem Area Description
EV-3954	6/30/19	Mainline/ North Spread/ MP 41.10/ Grady County	No	The Compliance Monitor observed that the erosion control devices had not been re-installed across an equipment bridge over a waterbody at the end of the prior day. There were no rain overnight; no sediment had entered the waterbody. The Compliance Monitor and the Lead EI discussed the issue. The Lead EI stated that he would discuss the issue with the contractor crews.
EV-3956	6/30/19	Mainline/ North Spread/ MP 43.60/ Grady County	Yes	The Compliance Monitor observed that the equipment bridge had shifted, causing damage to the geotextile fabric under-liner and side shields. The Compliance Monitor noted that upland sediment had entered the waterbody buffer, but had not entered the waterbody. The Compliance Monitor and the Lead EI discussed the issue. The Lead EI stated that he would discuss the issue with the contractor crews.
EV-3958	6/30/19	Mainline/ North Spread/ MP 46.40/ Grady County	Yes	The Compliance Monitor observed that the equipment bridge had shifted, causing damage to the geotextile fabric under-liner and side shields. The Compliance Monitor noted that upland sediment had entered the waterbody buffer, but had not entered the waterbody. The Compliance Monitor and the Lead EI discussed the issue. The Lead EI stated that he would discuss the issue with the contractor crews.
EV-3964	7/1/19	Mainline/ North Spread/ MPs 12.21 to 12.24/ Canadian County	Yes	The Compliance Monitor noted the following deficiencies during the inspection of a waterbody: <ul style="list-style-type: none">• A nearby topsoil pile inadequately protected;• Lining of the bridge requires repair;• Project related materials were stored outside of the right-of-way boundaries;• A pump was left overnight in an inadequate secondary containment within the waterbody buffer zone;• The required signage is not visible. The Compliance Monitor discussed the issues with the Lead EI.
EV-3995	7/2/19	Mainline/ North Spread/ MP 19.32/ Canadian County	Yes	The Compliance Monitor noted that the sheet pilings installed within a waterbody were impeding the water flow. The Compliance Monitor discussed the issue with the EI. The EI discussed the issue with the contractor.



SUMMARY OF PROBLEM AREA REPORTS FOR THE MIDSHIP PROJECT				
Report Number	Date Issued	Location (Spread or Facility/ MP/ County)	Follow-up Required (Yes or No)	Problem Area Description
EV-4004	7/3/19	Mainline/ North Spread/ MP 46.40/ Grady County	Yes	The Compliance Monitor noted that equipment mats placed in an unidentified, unnamed, flowing waterbody were causing sediment to flow downstream and into a larger waterbody. The Compliance Monitor, the Lead EI, and the EI discussed the issue. The environmental inspection team addressed the issue with the contractor crew.
EV-4005	7/3/19	Mainline/ North Spread/ MP 45.60/ Grady County	No	The Compliance Monitor observed that the erosion control devices had not been re-installed across an equipment bridge over a waterbody at the end of the prior day. There were no rain overnight; no sediment had entered the waterbody. The Compliance Monitor and the Lead EI discussed the issue. The Lead EI stated that he would discuss the issue with the contractor crews.
EV-4025	7/5/19	Mainline/ North Spread/ MP 85.50/ Stephens County	Yes	The Compliance Monitor observed erosion control devices that required repair or replacement. The Compliance Monitor discussed the issue with the Lead EI, who subsequently addressed the issue with the contractor.
EV-4035	7/5/19	Mainline/ North Spread/ MPs 12.51 to 12.89/ Canadian County	Yes	The Compliance Monitor observed contractor crews storing project materials on the topsoil piles. The Compliance Monitor discussed the issue with the Lead EI.
EV-4036	7/5/19	Mainline/ North Spread/ MPs 12.51 to 12.89/ Canadian County	Yes	The Compliance Monitor and the Lead EI discussed the need to retrieve sediment washed off the right-of-way during storm events. The off right-of-way areas are now stable enough to retrieve the sediment. The Compliance Monitor has not received any plans or other information regarding the timing of the off right-of-way sediment retrieval activities. The compliance Monitor discussed the need to retrieve the off right-of-way sediment with the Lead EI.
EV-4040	7/6/19	Mainline/ South Spread/ MPs 176.50 to 177.50/ Bryan County	Yes	The Compliance Monitor observed that subsoil had spilled off the right-of-way for a short distance in one location and had overflowed onto segregated topsoil piles in another location. The Compliance Monitor noted that crews were retrieving the subsoil spilled off the right-of-way and were separating the subsoil from the topsoil with no apparent topsoil loss. The Compliance Monitor informed the environmental inspection team of the observed issues.
Haggerty BR-0893.000 MP 176.27-177.37				
EV-4041	7/6/19	Mainline/ North Spread/ MP 26.28/ Canadian County	Yes	The Compliance Monitor observed project materials blocking a flume pipe in the road ditch and relayed the observation to the Lead EI.



Midcontinent Supply Header Interstate Pipeline Project, Docket No.: CP17-458-000
 Environmental Compliance Monitoring Program
 June 30 through July 6, 2019 Summary Report

SUMMARY OF PROBLEM AREA REPORTS FOR THE MIDSHIP PROJECT				
Report Number	Date Issued	Location (Spread or Facility/ MP/ County)	Follow-up Required (Yes or No)	Problem Area Description
EV-4042	7/6/19	Mainline/ North Spread/ MP 22.73/ Canadian County	Yes	The Compliance Monitor observed that rocks displaced from the road approach onto the right-of-way (previously documented in Communication reports EV-3769 issued on 6/19/2019, and EV-3793 issued on 6/20/2019, and in Problem Area reports EV-3856 issued on 6/25/2019, and EV-3896 issued on 6/27/2019) had not been removed from the right-of-way. The Compliance Monitor and the Lead EI discussed the need to retrieve the rocks. The Lead EI stated that he had discussed the issue with the contractor but the retrieval activities had not yet occurred.
EV-4046	7/6/19	Mainline/ North Spread/ MPs 28.04 to 28.65/ Canadian, Grady Counties	Yes	The Compliance Monitor noted that a pump in damaged secondary containment was leaking diesel onto the ground at the Canadian River HDD site. The Compliance Monitor informed the onsite utility inspector of the leak and the HDD crew immediately began the cleanup activities. The Compliance Monitor also noted several other damaged secondary containments at the site. The Compliance Monitor informed the EI of the observed issues.
EV-4047	7/6/19	Mainline/ North Spread/ MP 27.80/ Canadian County	Yes	The Compliance Monitor noted project related materials displaced off the right-of-way during past rain events and informed the EI of the observations. The Compliance Monitor scheduled a follow-up.

Billy & Melvin Long
 CN-0107.030
 MP 38.07-38.14



NONCOMPLIANCE REPORTS

Noncompliance reports record an observation where an area or activity violates (is not in compliance with) the project specifications, results in damage to resources, or places sensitive resources at unnecessary risk. Fourteen noncompliance reports were issued by the Compliance Monitors and/or compliance management team during this period, as detailed below.

SUMMARY OF NONCOMPLIANCE REPORTS FOR THE MIDSHIP PROJECT				
Report Number	Date Issued	Location (Spread or Facility/ Milepost [MP]/ County)	Follow-up Required (Yes or No)	Noncompliance Description
EV-3955	6/30/19	Mainline/ North Spread/ MP 43.60/ Grady County	No	The Compliance Monitor noted that several pieces of equipment had been parked overnight within 100 feet of a waterbody. The Compliance Monitor and the Lead EI discussed the issue, and the Lead EI stated he would address the issue with the contractor.
EV-3957	6/30/19	Mainline/ North Spread/ MPs 45.90 to 46.30/ Grady County	Yes	The Compliance Monitor noted severe wind and water erosion of the segregated topsoil as no topsoil stabilization efforts had been initiated. The Compliance Monitor also noted that the topsoil that eroded from the topsoil piles has blended into the subsoil along the graded right-of-way. The Compliance Monitor and the Lead EI discussed the observed issues.
EV-3959	6/30/19	Mainline/ North Spread/ MP 6.71/ Canadian County	Yes	The Compliance Monitor conducted a follow-up inspection of an area where a problem area report (EV-3939 issued on 6/29/2019) was issued for failure to properly stabilize topsoil piles as stipulated in the conditions of an approved variance request. The Compliance Monitor noted that the erosion control devices had been properly installed around the relocated topsoil pile on the southern side of the waterbody. On the northern side of the waterbody, the Compliance Monitor noted that the erosion control devices were installed backwards around some topsoil piles and no erosion control devices silt fences had been installed around the other topsoil piles. Additionally, seeding had not been completed on any of the topsoil piles. The Compliance Monitor discussed the issues with the EI. The EI contacted the contractor to begin the re-installation of the erosion control devices. The Lead EI informed the Compliance Monitor that no seeding of the topsoil piles could occur, as the contractor did not have any seeds available. The contractor stated they would purchase seeds and complete the seeding activities.
EV-3981 Allen & Cindy Stover CN-0062.000 MP 13.71-13.94	7/2/19	Mainline/ North Spread/ MPs 13.71 to 13.94/ Canadian County	Yes	The Compliance Monitor noted that numerous erosion control devices were damaged, several were improperly installed and several were overwhelmed with soil. Additionally, the Compliance Monitor noted mixing of topsoil and subsoil in several areas. The Compliance Monitor discussed the issues with the Lead EI and the EI.
EV-3982	7/2/19	Mainline/ North Spread/	Yes	The Compliance Monitor conducted a follow-up inspection of an area where a problem area report was issued for



SUMMARY OF NONCOMPLIANCE REPORTS FOR THE MIDSHIP PROJECT				
Report Number	Date Issued	Location (Spread or Facility/ Milepost [MP]/ County)	Follow-up Required (Yes or No)	Noncompliance Description
		MP 46.40/ Grady County		failure to properly design and maintain an equipment bridge at a waterbody crossing (EV-3958 issued on 6/30/19). The Compliance Monitor noted that no attempts to repair the equipment bridge had been made. The Compliance Monitor informed the Lead EI and the EI that a noncompliance report would be issued.
EV-3998	7/3/19	Mainline/ North Spread/ MP 12.22/ Canadian County	Yes	<p>The Compliance Monitor and the EI conducted an inspection at a waterbody crossing where dam and pump activities continued overnight, and noted that the pumps were not being continuously monitored. The Compliance Monitor returned to the area later, when the crossing activities actively began for the day, and observed that the water from the trench dewatering activities was overtopping the dewatering structure, mixing with sediment, and flowing into the waterbody. The crew ceased the dewatering activities. The Compliance Monitor noted that the diffuser to discharge the water during the dam and pump activities was eroding the downstream bank of the waterbody. The diffuser was moved and the erosion ceased. Portions of the right-of-way caved in during the crossing activities and topsoil was lost into the waterbody. When the right-of-way caved in, a pump in secondary containment shifted and the water in the secondary containment drained out onto the waterbody buffer. No sheen was noted on the water prior to the discharge. The Compliance Monitor noted that several of the other secondary containments within the waterbody buffer zone had holes in them and needed to be replaced. The Compliance Monitor returned to the site later in the day and observed that the area had been backfilled without the pipe being installed. Although some erosion control fabric was added to the banks, the crew did not finish the bank stabilization before returning flow to the waterbody channel, resulting in a large amount of silt in the waterbody. The Compliance Monitor also noted a worker entering the waterbody to retrieve hoses causing additional turbidity of the waterbody.</p> <p>The Compliance Monitor discussed the numerous observed deficiencies with the environmental inspection team and recommended that the issues that occurred during the failed crossing attempt be relayed to the new crossing crew and utilized as lessons learned so they are not repeated. The Compliance Monitor also informed the environmental inspection team that a noncompliance report would be issued. The Compliance Monitor asked to be informed of the schedule for the next crossing attempt.</p>
EV-4003	7/3/19	Mainline/ North Spread/ MP 63.10/ Grady County	Yes	The Compliance Monitor noted that equipment operating behind a topsoil pile had moved a portion of a topsoil pile to gain access to the travel side of the right-of-way and mixed the topsoil and subsoil. The Compliance Monitor informed the Lead EI of the mixing and the now unstabilized topsoil piles.



SUMMARY OF NONCOMPLIANCE REPORTS FOR THE MIDSHIP PROJECT				
Report Number	Date Issued	Location (Spread or Facility/ Milepost [MP]/ County)	Follow-up Required (Yes or No)	Noncompliance Description
EV-4007	7/3/19	Mainline/ North Spread/ MP 46.40/ Grady County	Yes	The Compliance Monitor conducted a follow-up inspection of an area where an equipment bridge at a waterbody crossing was not properly designed and maintained causing impacts to the waterbody (problem area report EV-3958 issued on 6/30/19 and noncompliance report EV-3982 issued on 7/2/19). The Compliance Monitor noted that erosion controls had been reinstalled on the bridge, but the corner of the bridge was still sinking into the waterbody. The Compliance Monitor discussed the continuing issues with the Lead EI and the EI. The EI informed the Compliance Monitor that the contractor had scheduled the replacement of the bridge after the holiday break.
EV-4020 Don Morris BR-0925.000 MP 183.58-183.87	7/5/19	Mainline/ South Spread/ MPs 183.00 to 183.80/ Bryan County	Yes	The Compliance Monitor noted that subsoil was stockpiled against segregated topsoil. Equipment then tracked on the topsoil, which caused mixing of the topsoil and subsoil. The overall impacted area was approximately 4,200 feet in length. The Compliance Monitor discussed the issue with the Lead EI. The Lead EI relayed the issue to the foreman for the crew. The foreman indicated that the soils would be separated separation to the extent possible during backfill activities.
EV-4024 Betty Starkey GR-0115.010 MP 30.47-30.56	7/5/19	Mainline/ North Spread/ MPs 30.50 to 31.00/ Grady County	Yes	The Compliance Monitor observed that the topsoil piles had not been stabilized or protected. A noncompliance report (EV-3558 issued on 6/3/19) was previously issued for failure to stabilize topsoil piles in this area. The Compliance Monitor noted large rills within the topsoil piles due to wind and water erosion and the eroded topsoil had flowed from the topsoil piles onto the right-of-way. Equipment operating in the area was tracking over the eroded topsoil and mixing subsoil with topsoil. The Compliance Monitor discussed the continued noncompliance with the Lead EI and informed him that another noncompliance report would be issued.
EV-4026	7/5/19	Mainline/ North Spread/ MP 85.50/ Stephens County	Yes	The Compliance Monitor observed that the topsoil piles had not been stabilized or protected. The Compliance Monitor discussed the issue with the Lead EI and informed him that a noncompliance report would be issued.
EV-4037	7/5/19	Mainline/ North Spread/ MP 12.84/ Canadian County	No	The Compliance Monitor noted that a portion of a highly eroded topsoil pile (previously documented in noncompliance report EV-3210 issued on 4/29/2019) had been partially removed and spread on the right-of-way. No pipe had been installed in this area and the area was not restored. A large amount of the spread topsoil could not be retrieved as it had mixed with the subsoil on the right-of-way. The Compliance Monitor discussed the issue with the Lead EI and the EI and informed them that a noncompliance report would be issued,



Midcontinent Supply Header Interstate Pipeline Project, Docket No.: CP17-458-000
 Environmental Compliance Monitoring Program
 June 30 through July 6, 2019 Summary Report

SUMMARY OF NONCOMPLIANCE REPORTS FOR THE MIDSHIP PROJECT				
Report Number	Date Issued	Location (Spread or Facility/ Milepost [MP]/ County)	Follow-up Required (Yes or No)	Noncompliance Description
EV-4039 Allen & Cindy Stover CN-0060.000 MP 13.27-13.71	7/5/19	Mainline/ North Spread/ MPs 13.25 to 13.28/ Canadian County	Yes	The Compliance Monitor noted that the sheet piling was impeding the flow of water of a waterbody. This issue was previously documented in Problem Area report EV-3995 issued on 07/02/2019, and Communication report EV-4000 issued on 07/03/2019. The environmental inspection team agreed that if sheet pilings were driven into waterbodies prior to crossing activities, they would be flush with the ground in order to prevent impeding the flow of water, and the water levels would be monitored to ensure that all waterbodies would remain unimpeded at all time. The Compliance Monitor also noted that the bank erosion had not been adequately addressed and some of the erosion control devices were defective, leaving the waterbody unprotected. The Compliance Monitor relayed the issues to the Lead EI and the EI and informed them that a noncompliance report would be issued.
EV-4049	7/6/19	Mainline/ North Spread/ MPs 27.32 to 28.04/ Canadian , Grady Counties	Yes	The Compliance Monitor observed that the topsoil piles had not been stabilized or protected and were showing signs of erosion. The Compliance Monitor also noted that project vehicles had been driving over the eroded portions of the topsoil piles, leading to some mixing with the subsoil and loss of the topsoil. The Compliance Monitor discussed the issue with the EI and informed him that a noncompliance report would be issued.

**PROBLEM AREA REPORTS**

Problem area reports record an observation where an area or activity does not meet the definition of acceptable but is not considered a noncompliance. Twenty-five problem area reports were issued by the Compliance Monitors during this period, as detailed below.

SUMMARY OF PROBLEM AREA REPORTS FOR THE MIDSHIP PROJECT				
Report Number	Date Issued	Location (Spread or Facility/ MP/ County)	Follow-up Required (Yes or No)	Problem Area Description
EV-3838	6/24/19	Chisholm Lateral / North Spread / MP 3.40 to 3.46	Yes	One June 22, 2019, the Compliance Monitor observed silt fence deficiencies in the vicinity of 180+00 pre-rain event. During this inspection, two days later, the Compliance Monitor observed that no repairs have been made. There was no EI assigned to the Chisholm Lateral during this period. The Compliance Monitor notified the Lead EI.
EV-3839	6/24/19	Chisholm Lateral / North Spread / MP 5.9	Yes	The Compliance Monitor observed that mats located off right-of-way had still not been retrieved. This issue has been pending for weeks and should be addressed promptly to prevent a noncompliance report. There was no EI assigned to the Chisholm Lateral during this period. The Compliance Monitor notified the Lead EI.
EV-3840	6/24/19	Chisholm Lateral / North Spread / MP 7.63	Yes	The Compliance Monitor conducted a post-rain event inspection at a waterbody crossing near MP 7.63. The Compliance Monitor observed that erosion control devices were deficient along the bridge over the waterbody resulting in sediment draining into the waterbody. A large amount of sediment is still visible on the bridge. There was no EI assigned to the Chisholm Lateral during this period. The Compliance Monitor notified the Lead EI that the deficiencies needed to be addressed within 24 hours.
EV-3841	6/24/19	Chisholm Lateral / North Spread / MP 12.59 to 12.67	Yes	The Compliance Monitor inspected the activities on the eastern side of Highway 81. Several deficiencies were noted. <ul style="list-style-type: none">-The topsoil pile along the edge of the right-of-way was not clearly delineated, which could result in topsoil mixing. Some topsoil loss was beginning to occur along the edge of the right-of-way and required stabilization.- No right-of-way stakes are visible along the edge of the right-of-way.- A pump secondary containment was not properly set up. There was no EI assigned to the Chisholm Lateral during this period. The Compliance Monitor notified the Lead EI.
EV-3852	6/24/19	Mainline / North Spread / MP 73.3	Yes	The Compliance Monitor conducted an inspection at MP 73.3 and observed that the erosion control devices had been damaged resulting in sediment to leaving the right-of-way within an upland area. The Lead EI was notified.



Midcontinent Supply Header Interstate Pipeline Project, Docket No.: CP17-458-000
Environmental Compliance Monitoring Program
June 23 through 29, 2019 Summary Report

SUMMARY OF PROBLEM AREA REPORTS FOR THE MIDSHIP PROJECT				
Report Number	Date Issued	Location (Spread or Facility/ MP/ County)	Follow-up Required (Yes or No)	Problem Area Description
EV-3855	6/25/19	Mainline / North Spread / MP 24.65	Yes	The Compliance Monitor conducted a follow-up inspection at a waterbody crossing at MP 24.65 where issues with inadequate erosion controls were identified resulting in sediment within a waterbody (see problem area report EV-3765, dated June 19, 2019). As of this follow-up inspection, no follow-up information has been received regarding the repairs or a plan of action. A rain event occurred on June 23, 2019. During this follow-up inspection, the Compliance Monitor observed that a majority of the erosion control deficiencies had not been repaired or maintained. The Compliance Monitor notified the Lead EI that the deficiencies needed to be addressed within 24 hours.
EV-3856	6/25/19	Mainline / North Spread / MP 22.73	Yes	The Compliance Monitor conducted a follow up inspection of an area where it was previously documented that a large amount of rock from a road approach was being displaced onto the right-of-way (see communication reports EV-3769, dated June 19, 2019 and EV-3793, dated June 20, 2019). During this inspection, the Compliance Monitor, observed that the issue has not been addressed and the rock was becoming embedded into the subsoil, which may affect restoration. The Compliance Monitor notified the Lead EI. T
EV-3857	6/25/19	Mainline / North Spread / MP 21.23 to 22.52	Yes	The Compliance Monitor conducted an inspection of the trenching crew between Reno Road W and 15th Street SW, and overserved that numerous silt fences were heavily damaged and a large amount of sediment was off right-of-way. These issues were a result of multiple rain events. The Compliance Monitor notified the Lead EI that the deficiencies needed to be addressed within 24 hours.
EV-3859	6/25/19	Mainline / North Spread / Off right-of-way	Yes	The Compliance Monitor observed that construction mats located off right-of-way in several locations still had not been retrieved. As of this report, no plan or timeframe has been communicated to the Compliance Monitor. The Compliance Monitor notified the Lead EI. The Compliance Monitor will conduct a follow-up inspection. There is no photo associated with this report.
EV-3864	6/25/19	Mainline / North Spread / MP 11.16 to 11.40	Yes	The Compliance Monitor conducted an inspection of tie-in activities between N Red Rock road and Darlington Road NW and observed that the crew was dewatering the trench. Several filter bags were located on the edge of the right-of-way and the water was draining directly into the adjacent wheat field resulting in flooding within the field. The area is a condemnation track and the landowner had filed complaints with FERC regarding the flooding of his wheat field and partial loss of his crop. The crew could have dewatered in the road ditch either on N Red Rock Road and Darlington Road NW. The EI was notified.



SUMMARY OF PROBLEM AREA REPORTS FOR THE MIDSHIP PROJECT				
Report Number	Date Issued	Location (Spread or Facility/ MP/ County)	Follow-up Required (Yes or No)	Problem Area Description
EV-3877	6/26/19	Mainline / North Spread / MP 35.2	Yes	The Compliance Monitor conducted an inspection of the Clayton Road crossing (MP 35.2), and observed mud and debris had been tracked onto the paved roadway and that the rock road approaches were covered in mud and needed to be refreshed with new rock and stone. The Compliance Monitor notified the EI who later replied that road sweepers and new rock for the road approaches would be directed to Clayton Road by the end of the day.
EV-3885	6/26/19	Mainline / North Spread / MP 17.26 to 17.40	Yes	The Compliance Monitor conducted an inspection of at waterbody and wetland crossing between MPs 17.26 and 17.40 and overserved that some erosion control devices were in need of maintenance. In addition, a large amount of sediment was found on the equipment bridge and needed to be removed. The Compliance Monitor notified the Lead EI.
EV-3889	6/26/19	Mainline / North Spread / MP 16.89	Yes	The Compliance Monitor conducted an inspection and overserved several erosion control devices that were previously noted as defective post rain event of Sunday June 23 had not been repaired. The Compliance Monitor notified the Lead EI.
EV-3891	6/26/19	Mainline / North Spread / MP 6.71	Yes	The Compliance Monitor conducted an inspection of sheet piling activities on the northern side of 164th St NW where missing no-refueling signs were previously documented (see communication report EV-3776, dated June 19, 2019). During this inspection, the Compliance Monitor observed that a sign had been added on the southern side of the crossing but the one on the north side was still missing. The Compliance Monitor notified the Lead EI.
EV-3896	6/27/19	Mainline / North Spread / MP 22.73	Yes	The Compliance Monitor conducted an inspection of an area where it was previously documented that a large amount of rock from a road approach was being displaced onto the right-of-way (see communication reports EV-3769, dated June 19, 2019 and EV-3793, dated June 20, 2019 and problem area report EV-3856, dated June 25, 2019). During this inspection, the Compliance Monitor observed that the issued had not been addressed and the rock continues to be imbedded into the subsoil. The Compliance Monitor notified the Lead EI. The Compliance Monitor will conduct a follow-up inspection. There are no photos associated with this report.



SUMMARY OF PROBLEM AREA REPORTS FOR THE MIDSHIP PROJECT				
Report Number	Date Issued	Location (Spread or Facility/ MP/ County)	Follow-up Required (Yes or No)	Problem Area Description
EV-3897	6/27/19	Mainline / North Spread / Off right-of-way	Yes	During an inspection with the FERC Project Manager, the FERC 3 rd -Party Compliance Manager, and the Lead EI, the issue of topsoil protection/replacement was discussed. The Lead EI was informed by the contractor Environmental Coordinator that a plan was being developed (see communication report EV-3815, dated June 22, 2019). The cleanup crew is about to start the topsoil replacement on a location where topsoil has been lost. As of this report date no plan or follow-up regarding the status of this plan has been provided. The Compliance Monitor notified the Lead EI. The Compliance Monitor will conduct a follow-up inspection. There are no photos associated with this report.
EV-3898	6/27/19	Mainline / North Spread / Off right-of-way	Yes	The Compliance Monitor observed that construction mats located off right-of-way in several locations still had not been retrieved. As of this report, no plan or timeframe has been communicated to the Compliance Monitor. This has been an ongoing issue (see problem area report 3859, dated June 25, 2019). The Compliance Monitor notified the Lead EI.
EV-3899	6/27/19	Mainline / North Spread / MP 25.54	Yes	The Compliance Monitor conducted a follow up inspection where bank erosion and inadequate erosion controls were previously documented at a waterbody crossing at MP 25.54 (see noncompliance report EV-3854, dated June 25, 2019). During this inspection, the Compliance Monitor observed that the erosion of the northern bank on upstream and downstream sides of the waterbody crossing had not been addressed and no information or mitigation plan had been received. In addition, the erosion controls were not repaired within the required FERC time requirements; however, an environmental team was present and informed the Compliance Monitor that the repairs would be completed by midday. The Compliance Monitor notified the Lead EI.
EV-3901	6/27/19	Mainline / North Spread / MP 23.1	Yes	The Compliance Monitor conducted a follow up inspection where inadequate erosion controls were previously documented at a waterbody crossing at MP 23.1 (see communication report EV-3792, dated June 25, 2019). During this inspection, the Compliance Monitor observed that the multiple deficiencies had not been repaired. In addition, the Compliance Monitor noted a section of excavated trench with no wildlife ramp installed and no fencing was protecting the edge of the trench. This is an area where cows and calves have routinely been observed. The Compliance Monitor notified the Lead EI.
EV-3919	6/28/19	Mainline / North Spread / MP 53.3	Yes	The Compliance Monitor conducted an inspection of an equipment bridge located at waterbody crossing at MP 53.3. Erosion control devices at the northeast and southeast corners of the equipment bridge were not keyed into the bridge, leaving gaps that would allow sediment to flow into the waterbody. No sediment had entered into the waterbody at the time of the inspection. The Compliance Monitor notified the Lead EI.



SUMMARY OF PROBLEM AREA REPORTS FOR THE MIDSHIP PROJECT				
Report Number	Date Issued	Location (Spread or Facility/ MP/ County)	Follow-up Required (Yes or No)	Problem Area Description
EV-3934	6/28/19	Mainline / North Spread / MP 12.22	Yes	The Compliance Monitor conducted an inspection of a waterbody crossing at MP 12.22 the day prior to pipeline installation. The Compliance Monitor observed that two pumps were installed on the southern bank of the waterbody, both of which were in secondary containments; however, both secondary containments had a tear in the plastic rendering them inadequate. No impact to the waterbody occurred. Both pumps were located within the no refueling buffer zone and no spill kits were in the vicinity of the pumps. The Compliance Monitor notified the EI who stated he had not given permission to locate equipment within the buffer zone as required by the FERC Procedures. Some of the right-of-way stakes were missing in the area and the Compliance Monitor recommended that the area be re-staked prior to the crossing.
EV-3937	6/29/19	Mainline / North Spread / MP 12.21 to 12.24	Yes	<p>The Compliance Monitor conducted an inspection of a waterbody crossing at MP 12.22 in the morning prior to and during pipeline installation. The day prior to the installation, the Compliance Monitor documented deficiencies with the secondary containments (see problem area report EV-3934, dated June 28, 2019). During this inspection, the Compliance Monitor observed that previously defective secondary containments had been corrected. However, the additional deficiencies were noted:</p> <ul style="list-style-type: none">- The lining of the bridge was damaged and full of sediment.- Straw bales installed to filter water were not keyed in.- The dewatering structure was installed immediately adjacent to a loose topsoil pile, which would likely result in impacts to the topsoil pile.- The connection of the hose to the filter bag was not secure.- The hoses leading to the filter bag were damaging silt fences.- Bank erosion was occurring during dam and pump activities.- The upstream dam was leaking water into the trench. <p>During the excavation of the trench, the sheet pilings started to fail and the foreman halted the crossing. The Compliance Monitor informed the EI of the concerns stated the environmental issues needed to be corrected prior to the re-start of construction activities.</p>



SUMMARY OF PROBLEM AREA REPORTS FOR THE MIDSHIP PROJECT				
Report Number	Date Issued	Location (Spread or Facility/ MP/ County)	Follow-up Required (Yes or No)	Problem Area Description
EV-3939	6/29/19	Mainline / North Spread / MP 6.71	Yes	<p>The Compliance Monitor attended a pre-construction meeting at the site of a planned waterbody crossing that included the EI and Utility Inspector.</p> <p>It was noted that, in the morning, a section of the area requested in variance #99 had been topsoiled north of the waterbody. The following deficiencies were noted as out of compliance with the conditions of the approved variance request:</p> <ul style="list-style-type: none">- The silt fence had not been installed at the boundary limit of the requested ATWS prior to any type of soil storage.- The topsoil piles were not immediately seeded- Silt fences were not installed to contain the topsoil. <p>The EI reiterated the conditions variance request that needed to be met to correct the current compliance issue. The Foreman contacted the environmental crew to ensure all would be addressed in the afternoon prior to the creek crossing activities of the next day. Environmental crew stated they would be addressing all issues in the afternoon.</p>
EV-3945	6/29/19	Mainline / South Spread / MP 189.60 to 190.40	No	<p>The Compliance Monitor inspected dewatering activities associated with a tie-in at a waterbody crossing. Water was pumped through a filter bag. The filter bag was observed to be ruptured with heavily silt laden water being discharged and flowing off right-of-way. Once notified, the pump operation was suspended and the foreman indicated a new filter bag would be used if additional pumping was required and that the off right-of-way sediment would be recovered. The impacted soil was contained for removal to the Durant contractor yard. The Lead EI was notified.</p>
EV-3947	6/29/19	Mainline / South Spread / MP 194.00 to 194.70	Yes	<p>The Compliance Monitor observed that subsoil spoil was stockpiled on segregated topsoil on the east side of Labor Road for a distance of approximately 25 feet a maximum height of 3 feet. The foreman indicated the soils would be separated. The Lead EI was notified.</p>

**NONCOMPLIANCE REPORTS**

Noncompliance reports record an observation where an area or activity violates (is not in compliance with) the project specifications, results in damage to resources, or places sensitive resources at unnecessary risk. Ten noncompliance reports were issued by the Compliance Monitors and/or compliance management team during this period, as detailed below.

SUMMARY OF NONCOMPLIANCE REPORTS FOR THE MIDSHIP PROJECT				
Report Number	Date Issued	Location (Spread or Facility/Milepost [MP]/ County)	Follow-up Required (Yes or No)	Noncompliance Description
EV-3851	6/24/19	Mainline/ North Spread/ MP 41.10/ Grady County	Yes	The Compliance Monitor conducted a follow-up inspection at a waterbody crossing at MP 41.1 where compliance issues were documented associated for inadequate erosion controls resulting in sediment entering the waterbody (see noncompliance reports EV-3744, dated June 17, 2019 and EV-3767, dated June 19, 2019). In this case geotextile fabric lined drainage ditches that were installed adjacent to the equipment bridge at the waterbody crossing, which directed stormwater into the waterbody with inadequate filtration. During this inspection, the Compliance Monitor observed that on the northwest side of the bridge, the sediment had been removed from the ditch and additional rock had been placed in the ditch. New chain link backed silt fence had been installed at the throat of the ditch (directly over the waterbody). However, on the southwest corner of the bridge, the silt fence and composite socks had been undermined, allowing sediment to again enter the waterbody following a 0.77-inch rain event had occurred within the past 48 hours. The Compliance Monitor notified the Lead EI.
EV-3854	6/25/19	Mainline/ North Spread/ MP 25.54/ Canadian County	Yes	The Compliance Monitor conducted an inspection of the erosion control devices at a waterbody crossing at MP 25.54 two days after a rain event occurred on June 23, 2019. This area has been the subject of previous compliance concerns regarding inadequate erosion controls (see problem area report EV-3763, dated June 19, 2019, and communication report EV-3805, dated June 21, 2019). During this visit, the Compliance Monitor observed that all of erosion control concerns identified on June 21 remained unaddressed. The Compliance Monitor notified the Lead EI that the deficiencies needed to be addressed within 24 hours.
EV-3875	6/25/19	Mainline/ North Spread/ MPs 28.60 to 29.20/ Grady County	Yes	The Compliance Monitor conducted a follow-up inspection of an area where topsoil and subsoil mixing was previously identified (see noncompliance reports EV-3202, dated April 27, 2019 and EV-3757 dated June 18, 2019). During this inspection the Compliance Monitor observed that no attempts had been made to correct the compliance issues at this location. The Compliance Monitor notified the Lead EI that the deficiencies needed to be addressed within 24 hours.



SUMMARY OF NONCOMPLIANCE REPORTS FOR THE MIDSHIP PROJECT				
Report Number	Date Issued	Location (Spread or Facility/Milepost [MP]/ County)	Follow-up Required (Yes or No)	Noncompliance Description
EV-3890	6/26/19	Mainline/ North Spread/ MPs 12.21 to 12.24/ Canadian County	Yes	The Compliance Monitor conducted an inspection at a waterbody crossing at MP 12.21 prior to crews arriving for work. The Compliance Monitor observed that a piece of equipment have been parked overnight within the buffer zone of the waterbody. A large amount of space was available to park outside of the buffer zone. The Lead EI was notified of the issue.
EV-3914	6/27/19	Mainline/ North Spread/ MP 35.20/ Grady County	Yes	The Compliance Monitor conducted a follow-up inspection of the Clayton Road area where mud and debris were previously documented as posing a safety concern (see problem area report EV-3877, dated June 26, 2019). During this inspection the Compliance Monitor observed that the mud and debris had only been partially removed from the roadway and the rock road approaches on both sides of the road had not been refreshed with new rock and stone. The Compliance Monitor notified the Lead EI.
EV-3925	6/28/19	Mainline/ North Spread/ MPs 21.23 to 22.52/ Canadian County	Yes	The Compliance Monitor conducted a follow-up inspection of an area where deficient erosion controls and off right-of-way sediment had been documented (see problem area report EV-3857, dated June 25, 2019). During this inspection the Compliance Monitor observed that several erosion control devices had not been repaired. In one area where repairs were made, the erosion controls were incorrectly installed and, therefore, ineffective. In addition, maintenance of erosion controls noted during the previous inspection had not occurred and the off right-of-way sediment has not been removed. The Compliance Monitor notified the Lead EI.
EV-3931	6/28/19	Mainline/ North Spread/ MPs 20.75 to 21.35/ Canadian County	Yes	The Compliance Monitor conducted a follow-up inspection of an area where dewatering and soil mixing issues were documented (see problem area report EV-3819, dated June 22, 2019). During this inspection the Compliance Monitor observed that the soil mixing and damaged topsoil piles issues had not been addressed, the erosion controls were ineffective and needed to be replaced/reinforced, and the off right-of-way sediment required removal. The Compliance Monitor notified the Lead EI.
EV-3938	6/29/19	Mainline/ North Spread/ MPs 12.21 to 12.24/ Canadian County	No	<p>The Compliance Monitor documented two instances of trespassing off right-of-way during creek crossing activities at MP 12.21. The first off right-of-way instance occurred when the Compliance Monitor overserved an environmental consultant was off right-of-way typing on his phone and making calls. Eventually, the Compliance Monitor recommended the EI to advise the environmental consultant to return to the right-of-way.</p> <p>The second off right-of-way instance occurred when the sheet piling began to collapse during the crossing and crews needed to attend to the emergency situation. Initially crew members traveled off right-of-way with sand bags to</p>



Midcontinent Supply Header Interstate Pipeline Project, Docket No.: CP17-458-000
 Environmental Compliance Monitoring Program
 June 23 through 29, 2019 Summary Report

SUMMARY OF NONCOMPLIANCE REPORTS FOR THE MIDSHIP PROJECT

Report Number	Date Issued	Location (Spread or Facility/Milepost [MP]/ County)	Follow-up Required (Yes or No)	Noncompliance Description
				attend to the emergency measure, which was considered necessary to prevent further stream impact. However, an environmental consultant and additional personnel who were not directly attending the emergency situation were observed off right-of-way. The EI and Lead EI were informed of these issues would be documented as a noncompliance.
EV-3952	6/29/19	Mainline/ North Spread/ MP 40.80/ Grady County	Yes	The Compliance Monitor conducted an inspection south of County Street 2850 Road (MP 40.7) and observed the use of heavy equipment had tracked onto topsoil piles and resulted in the mixing of topsoil and subsoil. The Lead EI was informed that a noncompliance report would be issued.
EV-3953	6/29/19	Mainline/ North Spread/ MP 41.00/ Grady County	Yes	The Compliance Monitor conducted an inspection north of the Salt Creek crossing and observed sheet piling stacked on top of a topsoil pile. The sheet pilings were covered with caked mud from other project related usage. The Lead EI was informed that a noncompliance report would be issued for not adequately maintaining topsoil piles as required by the FERC Plan.

**PROBLEM AREA REPORTS**

Problem area reports record an observation where an area or activity does not meet the definition of acceptable but is not considered a noncompliance. Seventeen problem area reports were issued by the Compliance Monitors during this period, as detailed below.

SUMMARY OF PROBLEM AREA REPORTS FOR THE MIDSHIP PROJECT				
Report Number	Date Issued	Location (Spread or Facility/ MP/ County)	Follow-up Required (Yes or No)	Problem Area Description
EV-3752	6/18/19	Mainline/ North Spread/ MPs 0.11 to 0.44/ Kingfisher County	Yes	The Compliance Monitor observed that a new silt fence (grey) was added in behind the first one (black) along the edge of the right-of-way. The crew then proceeded to make a large cut into the black silt fence to let the water filter through the grey one more easily. Because the grey silt fence was not properly keyed in, a small amount of sediment off the right-of-way. The silt fence needs to be adequately re-installed in order to be effective. The environmental inspection team was made aware of the issue.
EV-3758	6/19/19	Mainline/ South Spread/ MP 199.60/ Bryan County	Yes	Work was suspended at the Bennington Meter Station due to overnight rainfall of 1.8-inches. A gravel approach was installed at the north site entrance and silt fence was installed at the south entrance. The Compliance Monitor noted that some erosion controls were undermined, allowing unfiltered stormwater runoff to exit the site to Blue Bird Trail (upland area). The EI was informed of the problem and indicated it would be addressed with the site contractor.
EV-3763	6/19/19	Mainline/ North Spread/ MP 25.54/ Canadian County	Yes	The Compliance Monitor inspected erosion controls at a waterbody following a rain event. Multiple deficiencies were noted leading to silt laden water draining into the waterbody. Severe erosion of the banks were also noted and will have to be addressed promptly. No crews were encountered during the inspection. The EI was informed of the issues and the requirement that the repairs need to be made within 24 hours.
EV-3765	6/19/19	Mainline/ North Spread/ MP 25.65/ Canadian County	Yes	The Compliance Monitor inspected erosion controls at a waterbody following a rain event. Multiple deficiencies were noted leading to silt laden water draining into the waterbody. No crews were encountered during the inspection. The EI was informed of the issues and the requirement that the repairs needed to be made within 24 hours.
EV-3766	6/19/19	Mainline/ North Spread/ MP 23.10/ Canadian County	Yes	The Compliance Monitor inspected erosion controls at a waterbody following a rain event. Multiple deficiencies were noted leading to silt laden water draining into the waterbody. No crews were encountered during the inspection. The EI was informed of the issues and the requirement that the repairs need to be made within 24 hours.



SUMMARY OF PROBLEM AREA REPORTS FOR THE MIDSHIP PROJECT				
Report Number	Date Issued	Location (Spread or Facility/ MP/ County)	Follow-up Required (Yes or No)	Problem Area Description
EV-3770	6/19/19	Mainline/ North Spread/ MP 38.10/ Grady County	Yes	The Compliance Monitor observed that the silt fence had been damaged resulting in sediment and sediment laden water leaving the right-of-way within an upland area. It was also observed that the silt fence was inadequately installed, which allowed sediment to flow around the end of silt fence and off the right-of-way. The Midship Environmental Coordinator was informed that a problem area report would be issued.
EV-3772	6/19/19	Mainline/ North Spread/ MP 33.30/ Grady County	Yes	The Compliance Monitor observed mud and debris had been tracked onto a paved roadway and that the rock road approaches were covered in mud and needed to be refreshed with new rock and stone. The Midship Environmental Coordinator was informed that a problem area report would be issued. The Midship Environmental Coordinator stated that the contractor had been informed and that road sweepers and new rock for the road approaches would be directed to the road by the end of the day.
EV-3787	6/20/19	Mainline/ North Spread/ MP 19.93/ Canadian County		The Compliance Monitor conducted a follow-up inspection at a waterbody where concerns had been documented regarding inadequate erosion controls (see noncompliance report EV-3771, dated June 19, 2019). During this inspection, all erosion controls were functional along the bridge and the bridge was sediment free. The Compliance Monitor observed that the no-refueling sign on the eastern side of the waterbody was missing. Equipment was parked in the vicinity. The equipment appeared to be parked outside of the buffer zone; however, this was difficult to discern due to the lack of signage. The Lead EI was informed of the issue. A follow up inspection was conducted on two days later (see communication report EV-3816, dated June 22, 2019).
EV-3788	6/20/19	Mainline/ North Spread/ MPs 6.95 to 23.10/ Canadian County	Yes	The Compliance Monitor noted that numerous mats were still located off the right-of-way a few weeks after the large rain event that displaced them and noted that several landowners had been asking for the removal of these mats. The Lead EI was informed of the issue. The Lead EI contacted the contractor's Environmental Coordinator who stated that a helicopter would be used for the removal.



SUMMARY OF PROBLEM AREA REPORTS FOR THE MIDSHIP PROJECT				
Report Number	Date Issued	Location (Spread or Facility/ MP/ County)	Follow-up Required (Yes or No)	Problem Area Description
EV-3791	6/20/19	Mainline/ North Spread/ MPs 12.21 to 12.24/ Canadian County	Yes	During an inspection at a waterbody, the Compliance Monitor noted that additional erosion of the southern bank had occurred. The issue was discussed with the Lead EI. The foreman proposed to add additional sheet piling to stabilize the bank during the upcoming crossing and to prevent further water erosion at the base of the bank. The Lead EI spoke with the contractor's Environmental Coordinator, who stated he would propose to grade the undisturbed bank back. The Lead EI and the Compliance Monitor agreed that additional disturbance of the bank would not be beneficial. The Lead EI stated he would further discuss the issue with the contractor and update the Compliance Monitor on the stabilization proposal. The Compliance Monitor conducted a follow-up inspection the following day (see communication report EV-3805, dated June 21, 2019).
EV-3800	6/20/19	Mainline/ North Spread/ MP 12.24/ Canadian County	Yes	During an inspection at a waterbody, the Compliance Monitor noted that an open can of hydraulic oil was left on the right-of-way overnight at the edge of the buffer zone for the waterbody without a proper secondary containment. Cows are roaming the area in large numbers with a high potential to knock the can over resulting in a spill. The Compliance Monitor conducted a follow-up inspection the following day (see communication report EV-3805, dated June 21, 2019).
EV-3803	6/21/19	Mainline/ South Spread/ MPs 190.00 to 190.50/ Bryan County	Yes	The Compliance Monitor observed that the erosion control devices were overwhelmed with mud, resulting in the deposition of sediment off the right-of-way and in the pond. The foreman indicated mud would be removed, the muddy travel lane would be bladed to remove the material from proximity of the pond, and the erosion control device would be replaced. The Lead EI was informed a problem area report would be issued.
EV-3813	6/22/19	Mainline/ North Spread/ Off right-of-way/ N/A	Yes	The Compliance Monitor noted that numerous mats were still located off right-of-way of the mainline and the Chisholm Lateral a few weeks after the large rain event that displaced them (see EV-3788, dated June 20, 2019). No follow-up regarding mat retrieval had been received from the Midship representatives in the field. The Compliance Monitor informed the Lead EI that a problem area report would be issued.
EV-3817	6/22/19	Mainline/ North Spread/ MP 0.46/ Kingfisher County	No	The Compliance Monitor noted that the tie-in crew had mixed topsoil and subsoil piles while excavating the trench and silt fences were overwhelmed. The crew started addressing the issue immediately, segregating the soils and adding additional silt fences. The issue was discussed with the Lead EI, who was informed a problem area report would be issued.



SUMMARY OF PROBLEM AREA REPORTS FOR THE MIDSHIP PROJECT				
Report Number	Date Issued	Location (Spread or Facility/ MP/ County)	Follow-up Required (Yes or No)	Problem Area Description
EV-3819	6/22/19	Mainline/ North Spread/ MPs 20.02 to 20.75/ Canadian County	No	The Compliance Monitor inspected the lowering in, backfilling, and dewatering activities. The water in the trench was clear. However, the crew installed a filter bag in a depression full of mud and the clear water coming out of the bag mixed with the mud and started draining off the right-of-way. The erosion controls along the edge of the right-of-way were inadequately installed and a small amount of highly silt-laden water started running off right-of-way. The crew was informed of the issue stopped the activities. No impact to the sensitive resource occurred. The EI was informed and arrived on site shortly thereafter and worked with the crew. The EI was informed a problem area report would be issued.
EV-3835	6/22/19	Mainline/ North Spread/ MP 41.10/ Grady County	Yes	During an inspection of the equipment bridge at the a waterbody, the Compliance Monitor noted that erosion control devices were not installed and keyed into the bridge as required by the FERC Procedures. The Compliance Monitor met with the Lead EI and contractor's Environmental Coordinator and informed them of the compliance issues. The contractor's Environmental Coordinator indicated that these compliance issues would be corrected. Because no sediment had entered the waterbody the Compliance Monitor stated a problem area report would be issued.
EV-3836	6/22/19	Mainline/ North Spread/ MP 41.10/ Grady County	Yes	The Compliance Monitor accompanied Lead EI and contractor's Environmental Coordinator on a follow-up inspection at a waterbody where geotextile fabric lined drainage ditches had been installed adjacent to the equipment bridge and failed to prevent sediment from entering the waterbody (see noncompliance report EV-3767, dated June 19, 2019). During this inspection, the group noted that work was in progress to add more rock within the drainage ditch. The Compliance Monitor observed that on the west side of the ditch, the geotextile fabric had not been keyed into the bank and had begun to slip, creating an avenue for water and sediment to begin undermining the fabric with a high potential to enter the waterbody. The Lead EI and contractor's Environmental Coordinator were informed that a FERC Problem Area Report would be issued. The contractor's Environmental Coordinator indicated that the issue with the geotextile fabric would be corrected.

**NONCOMPLIANCE REPORTS**

Noncompliance reports record an observation where an area or activity violates (is not in compliance with) the project specifications, results in damage to resources, or places sensitive resources at unnecessary risk. Fourteen noncompliance reports were issued by the Compliance Monitors and/or compliance management team during this period, as detailed below.

SUMMARY OF NONCOMPLIANCE REPORTS FOR THE MIDSHIP PROJECT				
Report Number	Date Issued	Location (Spread or Facility/ Milepost [MP]/ County)	Follow-up Required (Yes or No)	Noncompliance Description
EV-3744	6/17/19	Mainline/ North Spread/ MP 41.10/ Grady County	Yes	The Compliance Monitor conducted a follow-up inspection of a waterbody after a 1.37-inch rain event had occurred over the past 48 hours. Previously, concerns were documented regarding the geotextile fabric lined drainage ditches that were installed adjacent to the equipment bridge at the waterbody (see communication report EV-3670, dated June 11, 2019). During this inspection, the Compliance Monitor noted the drainage ditch on the northwest side of the equipment bridge had failed, allowing sediment and sediment laden water to enter the waterbody. Sediment had entered the drainage and flowed over and around the rock check dams and composite socks, before undermining the silt fence and entering the waterbody. The Compliance Monitor informed the Midship Environmental Coordinator that a noncompliance report would be issued for the failure to prevent sediment-laden water from entering a waterbody.
EV-3750	6/18/19	Mainline/ North Spread/ MPs 0.11 to 23.48/ Kingfisher, Canadian Counties	Yes	The Compliance Monitor inspected tie-in activities and noted that there was evidence of new topsoil and subsoil mixing. Additionally, the Compliance Monitor noted that the mixing of topsoil and subsoil documented as a noncompliance by the EI the previous day had not been addressed (see EV-3739, dated June 17, 2019). The Compliance Monitor informed the Midship Environmental inspection team that a noncompliance report would be issued for the topsoil and subsoil mixing.
EV-3753	6/18/19	Mainline/ North Spread/ MP 30.00/ Grady County	Yes	The Compliance Monitor conducted a follow-up inspection at a waterbody where a previous problem area report had been issued for the failure to maintain erosion controls (see problem area report EV-3698, dated June 13, 2019). During this inspection, the Compliance Monitor noted that no attempt had been initiated to remove the previously documented sediment from the silt fence. The Midship Environmental Coordinator was informed that a noncompliance report would be issued for failure to perform maintenance of the silt fence within 24 hours of identification.
EV-3756	6/18/19	Mainline/ North Spread/ MP 39.70/ 		The Compliance Monitor conducted a follow-up inspection where a previous problem area report had been issued for the failure to maintain erosion controls (see problem area report EV-3699, dated June 13, 2019). During this



SUMMARY OF NONCOMPLIANCE REPORTS FOR THE MIDSHIP PROJECT				
Report Number	Date Issued	Location (Spread or Facility/ Milepost [MP]/ County)	Follow-up Required (Yes or No)	Noncompliance Description
		Grady County		inspection, the Compliance Monitor noted the sump had been cleaned out with a trackhoe bucket; however, no attempt to repair the silt fence or remove the sediment from the silt fence had been initiated. The Compliance Monitor informed the Midship Environmental Coordinator that a noncompliance report would be issued for failure to perform maintenance of the erosion controls within 24 hours of identification.
EV-3757	6/18/19	Mainline/ North Spread/ MPs 28.60 to 30.50/ Grady County	Yes	The Compliance Monitor conducted an inspection from MP 28.6 to MP 30.5 and observed that in flooded sections of the right-of-way, severe erosion to the unprotected and unstabilized topsoil piles had occurred from waves created by the pumping action that occurred as equipment traveled over the construction mats. In addition, construction mats, construction debris, and subsoil had also been pushed onto topsoil piles. During grading of the travel lane for stringing truck access to the right-of-way, subsoil and topsoil mixing had occurred. During pipe welding activities, equipment and vehicle use was mixing subsoil and topsoil. The Compliance Monitor informed the Midship Environmental Coordinator that a noncompliance report would be issued for mixing subsoil and topsoil.
EV-3767	6/19/19	Mainline/ North Spread/ MP 41.10/ Grady County	Yes	The Compliance Monitor conducted a follow-up inspection at a waterbody where sediment entered the waterbody as a result of the failure of geotextile fabric lined drainage ditches that were installed adjacent to the equipment bridge (see noncompliance report EV-3744 dated June 17, 2019). During this inspection, the Compliance Monitor noted that no attempts had been made to repair or stop the flow of sediment and sediment laden into the waterbody, and 0.64-inch overnight rain event had occurred, resulting in additional sediment and sediment-laden water entering the waterbody. The Compliance Monitor informed the Midship Environmental Coordinator that a noncompliance report would be issued for the failure to repair of all ineffective temporary erosion control measures within 24 hours of identification.
EV-3771	6/19/19	Mainline/ North Spread/ MP 19.93/ Canadian County	Yes	The Compliance Monitor inspected a waterbody and observed that no slope breakers had been installed prior to the crew leaving the site the prior day. While some erosion control devices had been placed across the bridge overnight, they were not sufficient, and no sideboards had been installed along the bridge. As a result, sediment flowed into the waterbody during the overnight rain event. A crew arrived on site during the inspection and began the necessary repairs. The EI was notified of the issues and that a noncompliance report would be issued for the lack of adequate erosion controls.
EV-3799	6/20/19	Mainline/ North Spread/	Yes	The Compliance Monitor accompanied FERC Project Manager, the ERM Project Manager on an inspection at a



SUMMARY OF NONCOMPLIANCE REPORTS FOR THE MIDSHIP PROJECT				
Report Number	Date Issued	Location (Spread or Facility/ Milepost [MP]/ County)	Follow-up Required (Yes or No)	Noncompliance Description
		MP 50.40/ Grady County		waterbody and noted a breach in the erosion control devices on the southeast waterbody buffer that was allowing sediment to enter the waterbody. The Lead EI was notified that noncompliance report would be issued for the failure to adequately maintain erosion controls.
EV-3826	6/21/19	Mainline/ North Spread/ MP 44.40/ Grady County	Yes	The Compliance Monitor observed that the sandbags on each side of the flume had been undermined, which was allowing sediment to enter an adjacent stream. The Compliance Monitor also noted the upslope erosion controls were failing and had not been maintained. The Compliance Monitor informed the Lead EI that a noncompliance report would be issued as for the failure to maintain erosion controls as required by the FERC Plan.
EV-3818	6/22/19	Mainline/ North Spread/ MP 20.02 to 20.75/ Canadian County	Yes	The Compliance Monitor conducted an inspection of lowering-in and backfilling activities and noted that topsoil and subsoil piles were mixed. No erosion controls had been installed along the topsoil piles. Some of the topsoil piles were damaged by equipment tracking on the right-of-way. The issue was communicated to the EI and the Lead EI, who were informed that a noncompliance report would be issued.
EV-3827	6/22/19	Mainline/ North Spread/ MP 38.10/ Canadian County	Yes	The Compliance Monitor conducted a follow-up inspection at MP 38.1 where a problem area report had been issued for the failure to maintain erosion controls (see problem area Report EV-3770, issued on 6/19/19). During this inspection, the Compliance Monitor noted that no attempt had occurred to extend the silt fence further upslope to prevent sediment from migrating off of the right-of-way, and the off right-of-way sediment has not been returned to the right-of-way. The Lead EI was informed that a noncompliance report would be issued for failure to repair the damage silt fence within 24 hours of identification as outlined in the FERC Plan.
EV-3828	6/22/19	Mainline/ North Spread/ MP 45.10/ Grady County	Yes	The Compliance Monitor noted that the silt fence had been overwhelmed and undermined allowing sediment to leave the right-of-way and flow into an adjacent pond off right-of-way. The Lead EI was informed that a noncompliance report would be issued for failure to maintain temporary erosion controls and allowing sediment laden water to enter a waterbody.
EV-3829	6/22/19	Mainline/ North Spread/ MPs 45.10 to 45.60/ Grady County	Yes	The Compliance Monitor conducted an inspection between MPs 45 and 45.6, and noted that bulldozers grading the right-of-way travel lane had mixed subsoil and topsoil and equipment mats had been pushed onto the topsoil piles. In addition, the topsoil piles throughout this section of right-of-way had not been stabilized or protected, and erosion had caused topsoil to flow from the topsoil piles onto the right-of-way. The location was the subject of a previous noncompliance for the failure to stabilize topsoil pile (see noncompliance report EV-3614, dated June 7, 2019). The



Midcontinent Supply Header Interstate Pipeline Project, Docket No.: CP17-458-000
 Environmental Compliance Monitoring Program
 June 16 through 22, 2019 Summary Report

SUMMARY OF NONCOMPLIANCE REPORTS FOR THE MIDSHIP PROJECT

Report Number	Date Issued	Location (Spread or Facility/ Milepost [MP]/ County)	Follow-up Required (Yes or No)	Noncompliance Description
				Compliance Monitor requested and onsite meeting with the Lead EI and the contractor's Environmental Coordinator, and after reviewing the topsoil issues, the Compliance Monitor informed them that a noncompliance would be issued for mixing subsoil and topsoil.
EV-3837	6/22/19	Mainline/ North Spread/ MP 34.50/ Grady County	Yes	The Compliance Monitor conducted an inspection at a waterbody and noted that a pump was located within 100 feet of the waterbody and was not contained within a secondary containment device. No crews were on site at the time of the inspection. The Lead EI was informed that a noncompliance report would be issued for the failure to confine the pump in secondary containment as required by in the FERC Procedures.

**PROBLEM AREA REPORTS**

Problem area reports record an observation where an area or activity does not meet the definition of acceptable but is not considered a noncompliance. Eighteen problem area reports were issued by the Compliance Monitors during this period, as detailed below.

SUMMARY OF PROBLEM AREA REPORTS FOR THE MIDSHIP PROJECT				
Report Number	Date Issued	Location (Spread or Facility/ MP/ County)	Follow-up Required (Yes or No)	Problem Area Description
EV-3623	6/9/19	Mainline/ South Spread/ MPs 192.80 to 193.60/ Bryan County	Yes	The Compliance Monitor noted that spoil had been bladed against the segregated topsoil at several locations, which could result in topsoil/subsoil mixing. The Compliance Monitor was notified that the soils would be separated to prevent topsoil/subsoil mixing and topsoil degradation. The Compliance Monitor will continue to monitor the site until the issue has been resolved.
EV-3624	6/9/19	Mainline/ South Spread/ MPs 192.50 to 192.90/ Bryan County	No	The Compliance Monitor noted that erosion control measures had not been reinstalled following completion of tie-in activities and restoration at flowing a waterbody the previous day, which could result in sediment deposition into the waterbody if not promptly addressed. The Compliance Monitor was notified that the erosion control devices would be installed before the end of the day.
EV-3643	6/10/19	Mainline/ North Spread/ MPs 12.51 to 13.28/ Canadian County	Yes	During a site inspection between Britton Road and a waterbody, the Compliance Monitor documented that several compliance issues identified during the previous reporting period had still not been addressed (e.g., erosion control device deficiencies, off right-of-way sediment, topsoil protection, streambank stabilization), which could result in sediment deposition in the waterbody and/or loss of topsoil if not promptly addressed. The Compliance Monitor and EI discussed the issues. The Compliance Monitor will continue to monitor the area until the compliance issues are resolved (see also communication report EV-3705, dated June 14, 2019).
EV-3658	6/11/19	Mainline/ North Spread/ MPs 0.44 to 1.51/ Kingfisher and Canadian Counties	Yes	In response to a call from the landowner, the Compliance Monitor conducted a follow-up inspection of the property and noted that a number of erosion control devices were improperly installed and sediment had migrated off right-of-way at several locations. The Compliance Monitor and EI discussed the issues. The Compliance Monitor will continue to monitor the property until the compliance concerns are resolved.
EV-3659	6/11/19	Mainline/ North Spread/ MPs 0.44 to 1.51/ Kingfisher and Canadian Counties	Yes	In response to a call from the landowner, the Compliance Monitor conducted a follow-up inspection of the property and noted improper use of filter bags during dewatering activities on the property. One filter bag had a hole in it and a second filter bag was left open and unattached to the hose, rendering both filter bags ineffective. Improper use of the filter bags could lead to off right-of-way deposition of sediment-laden water. In addition, trash was scattered along the right-of-way. The Compliance Monitor and EI discussed the issues. The Compliance Monitor will continue to monitor the property until the compliance concerns are resolved.



SUMMARY OF PROBLEM AREA REPORTS FOR THE MIDSHIP PROJECT				
Report Number	Date Issued	Location (Spread or Facility/ MP/ County)	Follow-up Required (Yes or No)	Problem Area Description
EV-3666	6/11/19	Mainline/ North Spread/ MPs 0.44 to 0.46/ Kingfisher County	Yes	The Compliance Monitor noted a completely obstructed flume pipe within a roadside ditch. The Compliance Monitor and EI discussed the need to address the issue promptly to avoid obstruction of water flow in the roadside ditch. The Compliance Monitor will conduct a follow-up inspection to verify that the issue has been resolved.
EV-3668	6/11/19	Mainline/ North Spread/ MP 41.10/ Grady County	Yes	During a follow-up inspection of the site of a previous problem area report issued for a bridge not installed high enough to withstand the highest flow expected at a waterbody, which resulted in damage to the bridge during a storm/flooding event, the Compliance Monitor noted that the replacement bridge was installed at the same height as the previous bridge. The Compliance Monitor spoke with the EI and Environmental Coordinator about the need to design and maintain equipment bridges to withstand and pass the highest expected flow per the requirements of the FERC Upland Erosion Control, Revegetation, and Maintenance Plan (Plan) section V.B.5.c. The Compliance Monitor will continue to monitor the site following storm events.
EV-3676	6/12/19	Mainline/ North Spread/ MP 6.71/ Canadian County	Yes	The Compliance Monitor attended an on-site meeting with representatives from Midship and Strike to discuss compliance issues (erosion control device deficiencies and silt-laden water entering the stream) at the site of the upcoming crossing of a waterbody. Crewmembers were actively addressing the issues, and the contractor committed to addressing compliance issues daily as necessary. The Compliance Monitor will continue to monitor the site to verify that all compliance issues are resolved.
EV-3677	6/12/19	Mainline/ North Spread/ MPs 12.89 to 12.91/ Canadian County	Yes	During an inspection of the right-of-way between Britton Road and a waterbody, the Compliance Monitor noted that sediment barriers had not been reinstalled at the bridge over the waterbody at the end of the workday. In addition, two slope breakers removed for travel along the right-of-way had not been reinstalled, which could lead to sediment entering the waterbody. No sediment had entered the waterbody at the time of the inspection. The Compliance Monitor and EI discussed the need to address the issues promptly. The Compliance Monitor will continue to monitor the site to verify the issues has been resolved.
EV-3678	6/12/19	Mainline/ North Spread/ MP 13.29/ Canadian County	Yes	The Compliance Monitor noted that the drainage at a waterbody had become overwhelmed with water and failed, resulting in damaged erosion control devices and off right-of-way sediment. The Compliance Monitor and EI discussed that all the erosion control devices will need to be repaired/reinstalled and the off right-of-way sediment will need to be removed. The Compliance Monitor will continue to monitor the site to verify the issues have been resolved.



SUMMARY OF PROBLEM AREA REPORTS FOR THE MIDSHIP PROJECT				
Report Number	Date Issued	Location (Spread or Facility/ MP/ County)	Follow-up Required (Yes or No)	Problem Area Description
EV-3679	6/12/19	Mainline/ North Spread/ MPs 12.21 to 12.24/ Canadian County	Yes	Following several unsuccessful requests/inquiries into the status of repairs to erosion control device deficiencies and areas of stream bank erosion at a waterbody (see communication reports EV-3640 and EV-3661, dated June 10 and 11, 2019), the Compliance Monitor contacted the Environmental Coordinator but no information was available. Because of the lack of communication after multiple requests for the plan to stabilize the area and the lack of any progress in repairing the failing erosion control devices, the issue was elevated to a problem area.
EV-3696	6/13/19	Mainline/ North Spread/ MP 9.51/ Canadian County	No	The Compliance Monitor noted that some equipment was parked overnight and a pump was stored overnight within the 100-foot waterbody buffer, a damaged dewatering bag was in use resulting in some off right-of-way sediment, and the bridge had not been cleaned at the end of the workday leaving a large amount of sediment with a high potential for falling into the waterbody. The issues were promptly addressed and the site foreman committed to conducting a site inspection at the end of each workday to verify the site is in compliance. The planned open-cut crossing of the waterbody was postponed to the following day to allow the crew to be fully prepared for the crossing.
EV-3698	6/13/19	Mainline/ North Spread/ MP 30.00/ Grady County	Yes	During an inspection of a waterbody, the Compliance Monitor noted that the silt fence at the northwest corner of the equipment bridge was overwhelmed with sediment. No sediment had entered the waterbody at the time of the inspection. The Compliance Monitor spoke to the EI and Environmental Coordinator regarding the need to properly maintain erosion control devices throughout construction (on a daily basis) and to reinstall them as necessary (such as after backfilling of the trench) until replaced by permanent erosion controls or restoration is complete per section IV.F of FERC's Plan. The Compliance Monitor will conduct a follow-up inspection of the site to verify that corrective measures have been implemented.
EV-3699	6/13/19	Mainline/ North Spread/ MP 29.70/ Grady County	Yes	During an inspection of the right-of-way north of County Road 1150, the Compliance Monitor noted that the silt fence had been overwhelmed, allowing sediment to migrate off right-of-way. The Compliance Monitor spoke to the EI and Environmental Coordinator regarding the need to properly maintain erosion control devices throughout construction. The Compliance Monitor will conduct a follow-up inspection of the site to verify that corrective measures have been implemented.
EV-3714	6/14/19	Mainline/ North Spread/ MPs 50.40 to 50.60/ Grady County	Yes	The Compliance Monitor noted that the silt fence had been overwhelmed, allowing sediment to migrate off right-of-way. The Compliance Monitor spoke to the EI and Environmental Coordinator regarding the need to properly maintain erosion control devices throughout construction. The Compliance Monitor will conduct a follow-up inspection of the site to verify that corrective measures have been implemented.



Midcontinent Supply Header Interstate Pipeline Project, Docket No.: CP17-458-000
 Environmental Compliance Monitoring Program
 June 9 through 15, 2019 Summary Report

SUMMARY OF PROBLEM AREA REPORTS FOR THE MIDSHIP PROJECT				
Report Number	Date Issued	Location (Spread or Facility/ MP/ County)	Follow-up Required (Yes or No)	Problem Area Description
EV-3716	6/14/19	Mainline/ North Spread/ MP 50.80/ Grady County	Yes	During a routine inspection of the equipment bridge at a waterbody, the Compliance Monitor noted that portions of the equipment bridge had floated off right-of-way due to recent rain/flood events. The Compliance Monitor and Environmental Coordinator discussed the issues at the bridge. The Compliance Monitor will continue to monitor the site.
EV-3720	6/15/19	Mainline/ North Spread/ MPs 0.11 to 0.44/ Kingfisher County	No	The Compliance Monitor noted that topsoil/subsoil mixing had occurred due to damaged and/or overwhelmed silt fence between the topsoil and subsoil piles. The issue was documented as a problem area report because only a small amount of topsoil/subsoil mixing had occurred, most of the soils could be easily separated, the issue was promptly addressed, and it is expected that no further soil mixing will occur.
EV-3721	6/15/19	Mainline/ North Spread/ MP 39.40/ Grady County	Yes	During an inspection of the right-of-way south of temporary access road 21, the Compliance Monitor noted that the silt fence had been overwhelmed, allowing sediment to migrate off right-of-way. The Compliance Monitor spoke to the EI and Environmental Coordinator regarding the need to properly maintain erosion control devices throughout construction. The Compliance Monitor will conduct a follow-up inspection of the site to verify that corrective measures have been implemented.

**NONCOMPLIANCE REPORTS**

Noncompliance reports record an observation where an area or activity violates (is not in compliance with) the project specifications, results in damage to resources, or places sensitive resources at unnecessary risk. Twelve noncompliance reports were issued by the Compliance Monitors and/or compliance management team during this period, as detailed below.

SUMMARY OF NONCOMPLIANCE REPORTS FOR THE MIDSHIP PROJECT				
Report Number	Date Issued	Location (Spread or Facility/ Milepost [MP]/ County)	Follow-up Required (Yes or No)	Noncompliance Description
EV-3634	6/10/19	Mainline/ North Spread/ MPs 9.68 to 9.75/ Canadian County	No	The Compliance Monitor issued a noncompliance report to document equipment parked overnight (and over the weekend) within 100 feet of a waterbody despite clear waterbody buffer zone signage in place and available parking available outside the buffer zone. This activity is out of compliance with section IV.A.1.d of FERC's Wetland and Waterbody Construction and Mitigation Procedures (Procedures), which requires that "all equipment is parked overnight and/or fueled at least 100 feet from a waterbody." The Compliance Monitor and EI discussed the issue and the equipment was moved.
EV-3635	6/10/19	Mainline/ North Spread/ MP 9.51/ Canadian County	No	The Compliance Monitor issued a noncompliance report to document hazardous material (i.e., several cases of diesel exhaust fluid and one fuel can) stored within 100 feet of a waterbody since the end of the workday on Saturday June 8, 2019. This activity is out of compliance with section IV.A.1.e of FERC's Procedures, which requires that "hazardous materials, including chemicals, fuels, and lubricating oils, are not stored within 100 feet of a wetland, waterbody, or designated municipal watershed area." The Compliance Monitor and EI discussed that these materials should not be left overnight or stored within 100 feet of a waterbody.
EV-3637	6/10/19	Mainline/ North Spread/ MP 9.51/ Canadian County	Yes	The Compliance Monitor issued a noncompliance report to document a failure to reinstall sediment barriers across the right-of-way to protect a waterbody and a failure to clean the bridge over the waterbody prior to leaving for the weekend, which resulted in sediment entering the waterbody during the larger rain event that occurred on Saturday. These issues are out of compliance with FERC's Procedures sections V.B.10.a and V.B.5.d. The Compliance Monitor and EI discussed the noncompliance issues at the site. The Compliance Monitor will continue to monitor the area until all compliance issues have been resolved.



SUMMARY OF NONCOMPLIANCE REPORTS FOR THE MIDSHIP PROJECT				
Report Number	Date Issued	Location (Spread or Facility/ Milepost [MP]/ County)	Follow-up Required (Yes or No)	Noncompliance Description
EV-3638	6/10/19	Mainline/ North Spread/ MPs 9.51 to 9.75/ Canadian County	Yes	The Compliance Monitor issued a noncompliance report to document mixing of the topsoil and subsoil piles on either side of North Red Rock Road. This is out of compliance with section IV.B.4 of FERC's Plan, which states, "Maintain separation of salvaged topsoil and subsoil throughout all construction activities." The Compliance Monitor and EI discussed the topsoil/subsoil mixing. The Compliance Monitor will continue to monitor the area until all compliance issues have been resolved.
EV-3639	6/10/19	Mainline/ North Spread/ MP 6.71/ Canadian County	Yes	The Compliance Monitor inspected a waterbody after the rain event that occurred on Sunday, June 9, 2019 in follow-up to multiple problem area and noncompliance reports issued during previous reporting periods for erosion control device deficiencies and sediment in the waterbody, including one noncompliance report on Saturday, June 8, 2019. The Compliance Monitor observed that none of the previously identified erosion control device deficiencies had been addressed and sediment had again entered the waterbody, which is out of compliance with section IV.F of FERC's Plan and section V.B.10 of FERC's Procedures. The Compliance Monitor and EI discussed the issues at the site. The Compliance Monitor will continue to inspect the area daily until all compliance issues are resolved.
EV-3655	6/11/19	Mainline/ North Spread/ MPs 0.44 to 1.53/ Kingfisher and Canadian Counties	Yes	The Compliance Monitor issued a noncompliance report to document a loss of topsoil throughout an agricultural area due to topsoil pile erosion, which is out of compliance with section IV.B.6 of FERC's Plan. FERC's Plan requires that topsoil piles be stabilized where necessary using sediment barriers, mulch, temporary seeding, tackifiers, or functional equivalents to minimize topsoil loss due to wind and water erosion. The Compliance Monitor and EI discussed the issue. The Compliance Monitor will continue to monitor the area until the compliance issues are resolved.
EV-3656	6/11/19	Mainline/ North Spread/ MPs 0.44 to 1.51/ Kingfisher and Canadian Counties	Yes	The Compliance Monitor issued a noncompliance report to document mixing of the topsoil and subsoil piles, which is out of compliance with section IV.B.4 of FERC's Plan, which states, "Maintain separation of salvaged topsoil and subsoil throughout all construction activities." The Compliance Monitor and EI discussed the issues. The Compliance Monitor will continue to monitor the area until the compliance issues are resolved.
EV-3660	6/11/19	Mainline/ North Spread/ MP 6.71/ Canadian County	Yes	The Compliance Monitor conducted another inspection of a waterbody in follow up to multiple problem area and noncompliance reports issued for erosion control device deficiencies and sediment in the waterbody, including one noncompliance report issued the previous day (see noncompliance report EV-3639, dated June 10, 2019). Only one defective erosion control device had been repaired. None of the other issues documented in the previous problem area and noncompliance reports had



SUMMARY OF NONCOMPLIANCE REPORTS FOR THE MIDSHIP PROJECT				
Report Number	Date Issued	Location (Spread or Facility/ Milepost [MP]/ County)	Follow-up Required (Yes or No)	Noncompliance Description
				been addressed. The Compliance Monitor issued an additional noncompliance report to document a failure to properly maintain the erosion control devices and to repair identified deficiencies in a timely manner, which is out of compliance with sections II.B.6 and IV.F of FERC's Plan. The Compliance Monitor and EI discussed the issues. The Compliance Monitor will continue to monitor the area until the compliance issues are resolved.
EV-3667	6/11/19	Mainline/ North Spread/ MP 33.60/ Grady County	Yes	The Compliance Monitor issued a noncompliance report to document an area where heavy equipment had tracked onto an unprotected pile of segregated topsoil resulting in topsoil/subsoil mixing, which is out of compliance with section IV.B.4 of FERC's Plan. The Compliance Monitor discussed the issue with the EI and Environmental Coordinator. The Compliance Monitor will conduct a follow-up inspection of the site to verify that the issue has been resolved.
EV-3669	6/11/19	Mainline/ North Spread/ MP 33.80/ Grady County	Yes	The Compliance Monitor issued a second noncompliance report to document another area where heavy equipment had tracked onto an unprotected pile of segregated topsoil resulting in topsoil/subsoil mixing, which is out of compliance with section IV.B.4 of FERC's Plan. The Compliance Monitor discussed the issue with the EI and Environmental Coordinator. The Compliance Monitor will conduct a follow-up inspection of the site to verify that the issue has been resolved.
EV-3700	6/13/19	Mainline/ North Spread/ MP 30.70/ Grady County	Yes	The Compliance Monitor issued a noncompliance report to document sediment entering a waterbody due to erosion control devices in need of maintenance, which is out of compliance with section IV.F of FERC's Plan, which requires that temporary erosion controls must be properly maintained throughout construction. The Compliance Monitor will conduct a follow-up inspection of the site to verify that corrective measures have been implemented.
EV-3723	6/15/19	Mainline/ North Spread/ MPs 37.30 to 42.20/ Grady County	Yes	The Compliance Monitor issued a noncompliance report to document topsoil/subsoil mixing during grading of the travel lane, which is out of compliance of section IV.B.4 of FERC's Plan. This is the same area where a noncompliance report was issued during the previous reporting period for a lack of stabilization of the topsoil piles, resulting in erosion of the topsoil onto the right-of-way. The Compliance Monitor and EI discussed the topsoil/subsoil mixing. The Compliance Monitor will continue to monitor the area until the compliance issues are resolved.

**PROBLEM AREA REPORTS**

Problem area reports record an observation where an area or activity does not meet the definition of acceptable but is not considered a noncompliance. Fifteen problem area reports were issued by the Compliance Monitors during this period, as detailed below.

SUMMARY OF PROBLEM AREA REPORTS FOR THE MIDSHIP PROJECT				
Report Number	Date Issued	Location (Spread or Facility/ MP/ County)	Follow-up Required (Yes or No)	Problem Area Description
EV-3541	6/3/19	Mainline/ North Spread/ MPs 12.89 to 12.91/ Canadian County	Yes	The Compliance Monitor conducted a follow-up inspection at a waterbody with the Lead EI and another EI where a problem area report was issued for inadequate erosion controls (see problem area report EV-3526, dated June 1, 2019). Some of the erosion controls in the vicinity of the bridge had not been modified and were not functional. The group also noted that some of the topsoil was being lost and not appropriately stabilized. The Compliance Monitor will conduct a follow-up inspection.
EV-3542	6/3/19	Mainline/ North Spread/ MPs 13.25 to 13.28/ Canadian County	Yes	The Compliance Monitor conducted a follow-up inspection at a waterbody with Lead EI and EI where a problem area report had been issued for inadequate erosion controls (see problem area report EV-3526, dated June 1, 2019). The group observed that because the geotextile fabric had been improperly keyed-in, erosion occurred during the last rain event, and some sediment entered the waterbody. The Compliance Monitor will conduct a follow-up inspection.
EV-3556	6/3/19	Mainline/ North Spread/ MP 37.40/ Grady County	Yes	The Compliance Monitor conducted an inspection of the right-of-way south of a temporary access road and observed the silt fence along the west side of the right-of-way had been overwhelmed with sediment. The sediment had migrated off the right-of-way into an upland area. The Environmental Coordinator was informed that a problem area report would be issued for failure to maintain temporary erosion controls. The Compliance Monitor will conduct a follow-up inspection.
EV-3557	6/3/19	Mainline/ North Spread/ MP 37.90/ Grady County	Yes	The Compliance Monitor observed silt fence along the west side of the right-of-way had been overwhelmed with sediment. The sediment had migrated off the right-of-way into an upland area. The Environmental Coordinator was informed that a problem area report would be issued for failure to maintain temporary erosion controls. The Compliance Monitor will conduct a follow-up inspection.
EV-3563	6/4/19	Mainline/ North Spread/ MP 44.09/ Grady County	Yes	The Compliance Monitor observed the silt fence along the west side of the right-of-way had been overwhelmed with sediment, and sediment had migrated off the right-of-way into an upland area. The Environmental Coordinator was informed that a problem area report would be issued for failure to maintain temporary erosion controls. The Compliance Monitor will conduct a follow-up inspection.



SUMMARY OF PROBLEM AREA REPORTS FOR THE MIDSHIP PROJECT				
Report Number	Date Issued	Location (Spread or Facility/ MP/ County)	Follow-up Required (Yes or No)	Problem Area Description
EV-3564	6/4/19	Mainline/ North Spread/ MP 40.60/ Grady County	Yes	The Compliance Monitor observed the silt fence along the east side of the right-of-way had been undermined and overwhelmed with sediment. The sediment had migrated off right-of-way into an upland area. The Environmental Coordinator was informed that a problem area report would be issued for failure to maintain temporary erosion controls. The Compliance Monitor will conduct a follow-up inspection.
EV-3575	6/5/19	Mainline/ South Spread/ MPs 190.00 to 191.00/ Bryan County	Yes	The Compliance Monitor observed an upland location where spoil and mud had overwhelmed the silt fence. Spoil was up to 4 feet off right-of-way for a length of 10 feet. Erosion control maintenance at various locations was required. The EI was notified and the Compliance Monitor will conduct a follow-up inspection.
EV-3581	6/5/19	Mainline/ North Spread/ MP 41.10/ Grady County	No	The Compliance Monitor issued a problem area report for failure to maintain erosion control devices at a waterbody equipment bridge. During an early morning inspection of the equipment bridge, the Compliance Monitor observed that erosion control devices had not been re-installed across the travel lane entrances to the equipment bridge, however, no sediment had entered the waterbody. The Compliance Monitor informed the EI of the compliance issues who relayed the information to the contractor.
EV-3584	6/5/19	Mainline/ North Spread/ MP 41.10/ Grady County	Yes	The Compliance Monitor observed that during the recent flood event at a waterbody, water had flowed up and over the bridge, causing the bridge decking to dislodge from the rail cars. Debris was observed trapped on the upstream side of the bridge. The Environmental Coordinator was contacted and informed that a problem area report was issued for failure design and maintain an equipment bridge to withstand and pass the highest expected flow. Construction crews had already began dismantling the damaged bridge mats in preparation to rebuild the bridge. The Compliance Monitor will continue to monitor the reconstruction process of this equipment bridge.
EV-3591	6/6/19	Mainline/ North Spread/ MPs 10.24 to 11.16/ Canadian County	No	The Compliance Monitor issued a problem area report after observing crews driving equipment over eroded topsoil on the northern side of 122 nd Street NW affecting the base of the topsoil pile. The Lead EI was informed of the issue.
EV-3597	6/7/19	Mainline/ North Spread/ MP 19.93/ Canadian County	Yes	The Compliance Monitor issued a problem area following a post rain event inspection at a waterbody. The Compliance Monitor observed that erosion controls were overwhelmed and needed maintenance, erosion controls across the bridge were inadequately installed, and a no-refueling sign on the eastern side of the waterbody is missing. The EI was informed that all deficiencies are expected to be addressed within 24 hours of identification. The Compliance Monitor will conduct a follow-up inspection.



SUMMARY OF PROBLEM AREA REPORTS FOR THE MIDSHIP PROJECT				
Report Number	Date Issued	Location (Spread or Facility/ MP/ County)	Follow-up Required (Yes or No)	Problem Area Description
EV-3598	6/7/19	Mainline/ North Spread/ MPs 19.31 to 19.32/ Canadian County	Yes	The Compliance Monitor issued a problem area following a post rain event inspection at a waterbody and wetland. Some erosion controls required maintenance, and several small erosion control device issues on and below the bridge need to be addressed to ensure continued protection of the sensitive resources. The issues were communicated to the environmental inspection team. The Compliance Monitor will conduct a follow-up inspection.
EV-3606	6/7/19	Mainline/ South Spread/ MPs 161.40 to 161.60/ Johnston County	No	The Compliance Monitor issued a problem area following a post rain event inspection at a wetland. Silt fence was overwhelmed with sediment. The issues were communicated to the environmental inspection team. In response, the environmental crew installed new silt fence and "super" silt fence to mitigate future problems. Up-gradient slope breakers were re-installed with energy dissipation checks. Where feasible, sediment was removed from the wetland area.
EV-3618	6/7/19	Mainline/ North Spread/ MP 39.30/ Grady County	Yes	The Compliance Monitor conducted a follow-up inspection where a problem area report had been issued for failure to design an equipment bridge at a waterbody to withstand the highest expected flow (see problem area report EV-3418, dated May 22, 2019). During this inspection, no change in the height of the bridge was observed. Flood debris was still present on the upstream side of the equipment bridge. The EI indicated that the contractor had raised the height of the bridge by adding one set of mats (8-10 inches); however, the EI was informed that the efforts to raise the height of the bridge were unsatisfactory and that an additional problem area report would be issued. The Compliance Monitor will conduct a follow-up inspection.
EV-3628	6/8/19	Mainline/ North Spread/ MP 44.00/ Grady County	Yes	The Compliance Monitor noted that an erosion control device had been overwhelmed with sediment allowing sediment to migrate from the right-of-way into an upland area, into the roadside ditch, and onto the roadway. The Environmental Coordinator was informed a problem area report would be issued for failure to maintain sediment barriers at this road crossing. The Compliance Monitor will conduct a follow-up inspection.



NONCOMPLIANCE REPORTS

Noncompliance reports record an observation where an area or activity violates (is not in compliance with) the project specifications, results in damage to resources, or places sensitive resources at unnecessary risk. Seventeen noncompliance reports were issued by the Compliance Monitors and/or compliance management team during this period, as detailed below.

SUMMARY OF NONCOMPLIANCE REPORTS FOR THE MIDSHIP PROJECT				
Report Number	Date Issued	Location (Spread or Facility/ Milepost [MP]/ County)	Follow-up Required (Yes or No)	Noncompliance Description
EV-3540	6/3/19	Mainline/ North Spread/ MP 12.22/ Canadian County	Yes	The Compliance Monitor conducted a follow-up inspection at a waterbody with the Lead EI and EI where a number of compliance issues had previously been documented (see communication reports EV-3439, dated May 24 and EV-3477 dated May 28, 2019, and noncompliance report EV-3524 dated June 01, 2019). The group agreed that both banks need to be stabilized after severe water erosion occurred as a result of the bridge displacement during a large rain event, and the observed bank erosion was a direct impact from the project. The erosion has been ongoing and no stabilization plan has been communicated. The Lead EI was informed that a noncompliance report would be issued. The Compliance Monitor will conduct a follow-up inspection.
EV-3545	6/3/19	Mainline/ North Spread/ MP 42.20/ Grady County	Yes	During an inspection of a waterbody (MP 42.2), The Compliance Monitor observed that a bulldozer had traveled through a waterbar resulting in the sediment laden water that was pooled behind the waterbar and to entered the waterbody. The equipment operator made no attempts to repair the damaged waterbar or stop the flow of sediment filled water into the waterbody. The EI was informed that a noncompliance report would be issued for failure to maintain erosion control devices. The EI relayed this information to the contractor and was informed that crews would be immediately dispatched to the waterbody to begin necessary repair work. The Compliance Monitor will conduct a follow-up inspection.
EV-3553	6/3/19	Mainline/ North Spread/ MPs 13.25 to 13.28/ Canadian County	Yes	The Compliance Monitor conducted a follow-up inspection with the Lead EI and EI at a waterbody where problem area report had been issued (see EV-3526, dated June 1, 2019). The off right-of-way sediment and bank erosion from multiple previous rain events had not been addressed. The erosion controls along the eastern side of the bridge had been defective for several weeks and not been repaired resulting in additional sediment in the waterbody and erosion during the subsequent rain events. In addition, the topsoil pile on the eastern side of the waterbody, which had been eroding for several weeks had not been adequately stabilized. The Lead EI and EI were informed a noncompliance report would be issued. The Compliance Monitor will conduct a follow-up inspection.



SUMMARY OF NONCOMPLIANCE REPORTS FOR THE MIDSHIP PROJECT				
Report Number	Date Issued	Location (Spread or Facility/ Milepost [MP]/ County)	Follow-up Required (Yes or No)	Noncompliance Description
EV-3558	6/3/19	Mainline/ North Spread/ MPs 30.40 to 33.30/ Grady County	Yes	The Compliance Monitor conducted an inspection of topsoil piles from County Road 1150 (MP 30.4) to Gin Road (MP 33.3). Severe wind and water erosion of the segregated topsoil piles were observed throughout this entire section of right-of-way, and no topsoil stabilization efforts had been initiated. Erosion rills were 6-8 inches in depth and the eroded topsoil piles had flowed from the topsoil piles and blended into the subsoil along the right-of-way, resulting in a loss of topsoil. The Environmental Coordinator was informed that a noncompliance report would be issued for failure to stabilize the segregated topsoil piles. The Compliance Monitor will conduct a follow-up inspection.
EV-3559	6/3/19	Mainline/ North Spread/ MPs 37.30 to 38.20/ Grady County	Yes	The Compliance Monitor conducted an inspection of the right-of-way from MP 37.3 to North 2840 Road (MP 38.2). Severe wind and water erosion of the segregated topsoil piles were observed throughout this entire section of right-of-way, and no topsoil stabilization efforts had been initiated. Erosion rills were 6-8 inches in depth and the eroded topsoil piles had flowed from the topsoil piles and blended into the subsoil along the right-of-way, resulting in a loss of topsoil. The Environmental Coordinator was informed that a noncompliance report would be issued for failure to stabilize the segregated topsoil piles. The Compliance Monitor will conduct a follow-up inspection.
EV-3566	6/4/19	Mainline/ North Spread/ MPs 39.80 to 44.40/ Grady County	Yes	The Compliance Monitor conducted an inspection of the topsoil piles from Sooner Road (MP 39.9) to MP 44.4. Severe wind and water erosion of the segregated topsoil piles were observed throughout this entire section of right-of-way, and no topsoil stabilization efforts had been initiated. Erosion rills were 6-8 inches in depth and the eroded topsoil piles had flowed from the topsoil piles and blended into the subsoil along the right-of-way, resulting in a loss of topsoil. The Environmental Coordinator was informed that a noncompliance report would be issued for failure to stabilize the segregated topsoil piles. The Compliance Monitor will conduct a follow-up inspection.
EV-3571	6/5/19	Mainline/ North Spread/ MP 6.71/ Canadian County	Yes	The Compliance Monitor conducted a follow-up inspection at a waterbody where a problem area report had been issued for inadequate erosion controls and sediment in the waterbody (see problem area report EV- 3527, dated June 1, 2019). The deficiencies noted on June 1st had not been addressed, additional erosion control concerns were observed, and rain was forecast for the next day. The Compliance Monitor informed the Lead EI that a noncompliance would be issued for the failure to address erosion control deficiencies in a timely manner. The Compliance Monitor will conduct a follow-up inspection.
EV-3583	6/5/19	Mainline/ North Spread/ MP 41.10/	Yes	During an inspection of a waterbody, the Compliance Monitor noted that the erosion control device had been undermined and overwhelmed with sediment in two



SUMMARY OF NONCOMPLIANCE REPORTS FOR THE MIDSHIP PROJECT				
Report Number	Date Issued	Location (Spread or Facility/ Milepost [MP]/ County)	Follow-up Required (Yes or No)	Noncompliance Description
		Grady County		separate places and migrated from the right-of-way, crossed a riparian buffer and entered the waterbody. The Compliance Monitor met with the EI and informed him a noncompliance report would be issued for failure to maintain erosion control devices and allowing sediment to enter a waterbody. The EI informed the contractor of the compliance issues and an environmental crew was dispatched to site to begin corrective measures. The Compliance Monitor will conduct a follow-up inspection.
EV-3588	6/6/19	Mainline/ North Spread/ MP 6.71/ Canadian County	Yes	The Compliance Monitor conducted a follow-up inspection at a waterbody where a noncompliance report had been issued for inadequate erosion controls and sediment in the waterbody (see noncompliance report EV- 3571, dated June 5, 2019). Some of the deficiencies noted on June 5, 2019 had not been adequately addressed. Erosion controls were either inadequately installed or not maintained in multiple locations. Additional sediment had entered the waterbody. The Compliance Monitor also observed that project debris had been pushed onto a topsoil pile and was starting to mix into the topsoil. The Lead EI was informed of the deficiencies and the expectation that they are corrected within 24 hours. It was also noted that a large rain event was in the forecast. The Compliance Monitor will conduct a follow-up inspection.
EV-3589	6/6/19	Mainline/ North Spread/ MPs 12.89 to 13.28/ Canadian County	Yes	<p>The Compliance Monitor conducted a follow-up inspection at two waterbodies, which were the subject of a recent on-site meeting with the contractor and Lead EI regarding outstanding compliance issues (see communication report EV-3572, dated June 5, 2019). During the previous meeting, a list corrective actions were identified as being necessary to bring the site back into compliance. The Compliance Monitor noted that many of the issued had not been addressed and no information had been provided for the delay. All previously identified issues were expected to have been addressed within 24 hours of identification, and specifically before the large rain event in the forecast.</p> <p>At the waterbody ay MP 12.89, two slope breakers on the eastern side of were re-installed, and silt fences were re-installed as well. However, a sump at the end of one of the slope breakers was already overwhelmed before the day's rain event. The silt fence around the topsoil pile had not been extended as previously agreed upon.</p> <p>At the waterbody at MP 13.25, plastic had been added to the western bank to prevent further bank scouring. New erosion controls on the eastern side of the bridge were installed to prevent sediment from reaching the waterbody; however, they were not keyed in. The topsoil pile on the eastern side of the waterbody has not been protected as previously discussed during the last joint inspection. The</p>



SUMMARY OF NONCOMPLIANCE REPORTS FOR THE MIDSHIP PROJECT				
Report Number	Date Issued	Location (Spread or Facility/ Milepost [MP]/ County)	Follow-up Required (Yes or No)	Noncompliance Description
				issues were discussed with the Lead EI. The Compliance Monitor will conduct a follow-up inspection.
EV-3596	6/7/19	Mainline/ North Spread/ MPs 6.71 to 6.95/ Canadian County	Yes	The Compliance Monitor conducted a follow-up inspection at a waterbody with the EI where a noncompliance report was issued for failure to conduct corrective actions in a timely manner to address inadequate erosion controls and sediment in the waterbody (previously documented in noncompliance report EV- 3588, dated June 6, 2019). During this inspection, the compliance monitor noted that no progress had been made in correcting the multiple outstanding compliance issues. The EI was informed that another noncompliance report would be issued for the failure to conduct corrective actions within a timely manner. The Compliance Monitor will conduct a follow-up inspection.
EV-3599	6/7/19	Mainline/ North Spread/ MPs 6.93 to 7.01/ Canadian County	Yes	The Compliance Monitor conducted an inspection and observed several trackhoes working in a flooded area. The water on the right-of-way was heavily silt laden. Numerous silt fences were damaged including one in the immediate vicinity of the crew, which resulted in a large amount of heavily silt laden water to drain into a clear water pond adjacent to the right-of-way. The Compliance Monitor contacted the EI who mobilized to the site and spoke with the crew, who began to install erosion controls. Subsequently, a berm was constructed to stop the flow of heavily silt laden water. Later the berm was compromised resulting in additional silt laden water entering pond. The compromised berm was rebuilt. The EI was informed that a noncompliance report would be issued for the heavily silt laden water entering the pond. The Compliance Monitor will conduct a follow-up inspection.
EV-3614	6/7/19	Mainline/ North Spread/ MPs 45.00 to 45.90/ Grady County	Yes	During an inspection of topsoil piles from MP 45 to MP 45.9, the Compliance Monitor noted severe wind and water erosion of the segregated topsoil piles throughout this entire section of right-of-way. No topsoil stabilization efforts had been initiated. The topsoil that has eroded from the topsoil piles had flowed from the topsoil piles and has blended into the subsoil along the right-of-way resulting in a loss of topsoil. The Environmental Coordinator was informed that a noncompliance report would be issued for failure to stabilize the segregated topsoil piles. The Compliance Monitor will conduct a follow-up inspection.
EV-3612	6/8/19	Mainline/ North Spread/ MP 6.71/ Canadian County	Yes	The Compliance Monitor conducted a follow-up inspection at a waterbody where a noncompliance report was issued for failure to conduct corrective actions in a timely manner to address inadequate erosion controls and sediment in the waterbody (see noncompliance report EV- 3596, dated June 7, 2019). The Compliance Monitor observed that two small sections of silt fence were repaired. However, the multiple other deficiencies



SUMMARY OF NONCOMPLIANCE REPORTS FOR THE MIDSHIP PROJECT				
Report Number	Date Issued	Location (Spread or Facility/ Milepost [MP]/ County)	Follow-up Required (Yes or No)	Noncompliance Description
				identified in previous problem area and noncompliance reports had not been addressed. The outstanding deficiencies were discussed with the EI who was informed that another noncompliance report would be issued the failure to conduct corrective actions within a timely manner. The Compliance Monitor will conduct a follow-up inspection.
EV-3620	6/8/19	Mainline/ North Spread/ MP 44.00/ Grady County	Yes	The Compliance Monitor conducted a follow-up inspection at MP 44 where a problem area report had been issued for the failure to maintain erosion control devices resulting in sediment migrating off right-of-way (see problem area report EV-3563, dated June 4, 2019). During this inspection, the Compliance Monitor noted that there had been no attempt to repair the overwhelmed silt fence or retrieve the sediment that had migrated off of the right-of-way. The Environmental Coordinator was informed that a noncompliance report would be issued for failure to repair the damage silt fence within 24 hours of identification. The Compliance Monitor will conduct a follow-up inspection.
EV-3621	6/8/19	Mainline/ North Spread/ MP 35.10/ Grady County	Yes	During an inspection of the right-of-way north of MP 35.2, the Compliance Monitor noted that heavy equipment had tracked into an unprotected pile of segregated topsoil. The EI and the contractor's Environmental Coordinator were also present. They were informed that a noncompliance report would be issued for the failure to maintain separation of salvaged topsoil and subsoil. The contractor's Environmental Coordinator stated that the topsoil and subsoil would be separated and an environmental crew would be dispatched immediately to the site to begin installing silt fence to separate the topsoil piles from the travel lane to prevent further mixing of subsoil and topsoil. The Compliance Monitor will conduct a follow-up inspection.
EV-3622	6/8/19	Mainline/ North Spread/ MP 51.80/ Grady County		While conducting an inspection at a waterbody, the Compliance Monitor observed that the erosion controls on the northeast side had been overwhelmed with sediment, allowing the sediment to migrate from the right-of-way, cross the riparian buffer and enter the waterbody. On the southwest side, the erosion controls behind the temporary workspace had also been overwhelmed, allowing sediment to migrate from the right-of-way and enter the waterbody. The Midship Environmental Coordinator was informed that a noncompliance report would be issued for failure to adequately maintain sediment barriers and allowing sediment to enter the waterbody. The Compliance Monitor will conduct a follow-up inspection.

**PROBLEM AREA REPORTS**

Problem area reports record an observation where an area or activity does not meet the definition of acceptable but is not considered a noncompliance. Eleven problem area reports were issued by the Compliance Monitors during this period, as detailed below.

SUMMARY OF PROBLEM AREA REPORTS FOR THE MIDSHIP PROJECT				
Report Number	Date Issued	Location (Spread or Facility/ MP/ County)	Follow-up Required (Yes or No)	Problem Area Description
EV-3479	5/28/19	Mainline/ North Spread/ MPs 18.22 to 18.23/ Canadian County	Yes	The Compliance Monitor conducted a site visit at a waterbody and wetland crossing in response to a problem area report (EV-3413) issued on 5/22/19. Numerous erosion control devices were observed to be defective. The Compliance Monitor also noted that the waterbody and wetland needed to be re-surveyed and re-staked prior to construction activities scheduled for 5/30/19 because all staking was washed away during the recent flood events. The Compliance Monitor informed the environmental inspection team of the issues and scheduled a follow-up site visit.
EV-3483	5/28/19	Mainline/ North Spread/ MPs 17.50 to 17.80/ Canadian County	Yes	The Compliance Monitor observed that the topsoil piles needed to be properly stabilized and that a vehicle had driven through the eroded topsoil. The failure to properly stabilize topsoil piles was previously noted in EV-3419 on 5/22/19. The issue was relayed to the environmental inspection team .
EV-3485	5/29/19	Mainline/ North Spread/ MPs 18.22 to 18.23/ Canadian County	Yes	The Compliance Monitor conducted a follow-up site visit of a waterbody and wetland crossing in response to a problem area report (EV-3479) issued on 5/28/19. The defective erosion control devices had not been repaired. The Compliance Monitor also noted that the sensitive resources had not been re-surveyed and re-staked; crossing activities are scheduled for 5/30/19. The observations were relayed to the environmental inspection team and the Compliance Monitor scheduled a follow-up visit to the area.
EV-3489	5/29/19	Mainline/ South Spread/ MPs 120.00 to 121.00/ Cater County	No	The Compliance Monitor noted that additional inadvertent releases occurred at the Henry House Creek HDD crossing and entered the waterbody. Two containment dams were constructed to contain the releases, and the pumps recovered and transferred the fluid to the bore pit. Reaming operations were suspended until cleanup was completed. The Compliance Monitor and the Lead EI discussed the release of the drilling fluid into the flowing waterbody. The Lead EI recommended to the HDD subcontractor that installation of additional containment due to the possibility of new inadvertent releases should be implemented. The Compliance Monitor and the Lead EI discussed that the secondary containment of the pumps be improved.



SUMMARY OF PROBLEM AREA REPORTS FOR THE MIDSHIP PROJECT				
Report Number	Date Issued	Location (Spread or Facility/ MP/ County)	Follow-up Required (Yes or No)	Problem Area Description
EV-3505	5/31/19	Mainline/ North Spread/ MPs 3.79 to 4.84/ Canadian County	Yes	The Compliance Monitor observed that the topsoil piles were eroding on the western side of the right-of-way. The Compliance Monitor was unable to determine if the eroded topsoil was still within the right-of-way boundaries as the survey stakes were no longer present. The Compliance Monitor discussed the issues with the environmental inspection team and scheduled a follow-up site visit to the area.
EV-3506	5/31/19	Mainline/ North Spread/ MP 6.71/ Canadian County	Yes (see EV-3527 on 6/1/19)	The Compliance Monitor conducted a site visit as a follow up to a problem area report (EV-3444) issued on 05/25/19 for inadequate erosion control devices. The inadequacies of the erosion control devices had been previously discussed with both the EI and the contractor representatives. The erosion control devices failed again during the latest rain event. The Compliance Monitor and the EI discussed the need to replace the erosion control devices, and a crew arrived onsite to address the issue. The Compliance Monitor scheduled a follow-up inspection of the area.
EV-3525	6/1/19	Mainline/ North Spread/ MPs 12.24 to 12.51/ Canadian County	Yes	The Compliance Monitor observed coating residue and other debris on the right-of-way. This issue was previously noted in EV-2935, EV-2985, and EV-3037 and discussed again with the environmental inspection team. The Compliance Monitor scheduled a follow-up inspection of the area.
EV-3526	6/1/19	Mainline/ North Spread/ MPs 12.90 to 13.26/ Canadian County	Yes	The Compliance Monitor conducted a follow-up inspection of an area where erosion control devices were observed as non-functional (previously documented in communication report EV-3497 issued on 05/30/19). The Compliance Monitor observed that some of the erosion control devices were still non-functional. The Compliance Monitor relayed the issues to the Lead EI. The Lead EI scheduled a site visit with the Compliance Monitor and the contractor environmental crew to assess all deficiencies and identify corrective actions as needed.
EV-3527	6/1/19	Mainline/ North Spread/ MP 6.71 Canadian County	Yes	The Compliance Monitor conducted a follow-up site visit at a waterbody crossing in response to a problem area report (EV-3506) issued on 5/31/19 for inadequate erosion control devices. The Compliance Monitor noted that the erosion control devices near the bridge were inadequately installed and that other erosion control devices had not been properly maintained. The Compliance Monitor relayed the issues to the environmental inspection team and will conduct another follow-up visit to ensure all corrective actions have been completed.
EV-3530	6/1/19	Mainline/ North Spread/ MPs 17.51 to 19.26/ Canadian County	Yes	The Compliance Monitor observed erosion control devices that had been overwhelmed with sediment, allowing sediment to travel off right-of-way. The Compliance Monitor relayed the issues to the environmental inspection team and will conduct a follow-up visit to ensure all corrective actions have been completed.



SUMMARY OF PROBLEM AREA REPORTS FOR THE MIDSHIP PROJECT

Report Number	Date Issued	Location (Spread or Facility/ MP/ County)	Follow-up Required (Yes or No)	Problem Area Description
EV-3531	6/1/19	Mainline/ North Spread/ MPs 17.26 to 17.40/ Canadian County	Yes	The Compliance Monitor conducted a site visit of a waterbody and wetland crossing and noted that the bridge, which had been damaged by heavy equipment the previous day, had not been repaired and was now impeding the flow of water. The Compliance Monitor relayed the issue to the environmental inspection team and will conduct a follow-up visit to ensure all corrective actions have been completed.



View of issue documented in EV-3479: damaged and undermined erosion control device. North Spread, MP 18.22.

**NONCOMPLIANCE REPORTS**

Noncompliance reports record an observation where an area or activity violates (is not in compliance with) the project specifications, results in damage to resources, or places sensitive resources at unnecessary risk. Nine noncompliance reports were issued by the Compliance Monitors and/or compliance management team during this period, as detailed below.

SUMMARY OF NONCOMPLIANCE REPORTS FOR THE MIDSHIP PROJECT				
Report Number	Date Issued	Location (Spread or Facility/ Milepost [MP]/ County)	Follow-up Required (Yes or No)	Noncompliance Description
EV-3476	5/28/19	Mainline/ North Spread/ MPs 23.10 to 25.54/ Canadian County	Yes	The Compliance Monitor conducted a follow-up site visit of three waterbody crossings in response to previous noncompliance reports (EV-3414 on 5/22/19, EV-3438 on 5/24/19, and EV-3455 on 5/25/19). The Compliance Monitor noted that no corrective measures had been implemented. Pieces of the equipment bridge damaged by previous flood events were still impeding the flow of water at two waterbody crossings, and the erosion control devices are still inadequate at the third crossing. The Compliance Monitor informed the EI of these ongoing issues and scheduled another follow-up inspection.
EV-3484	5/29/19	Mainline/ North Spread/ MPs 12.90 to 13.26/ Canadian County	Yes	<p>The Compliance Monitor performed a post rain event follow-up site visit of two waterbody crossings. Issues at these areas were previously documented in noncompliance report EV-3414 issued on 5/22/2019 and communication report EV-3478, issued on 5/28/19. The Compliance Monitor observed that one bridge had been rebuilt and properly anchored, but the erosion control devices were still in need of maintenance, and additional erosion control devices were still needed to fully protect the waterbody.</p> <p>At the other waterbody crossing, the Compliance Monitor observed that the damaged bridge had been removed, but additional erosion control devices still needed to be installed to fully protect the waterbody. Additionally, the Compliance Monitor noted that some erosion control devices had not been maintained since 5/6/19, as documented in EV-3262.</p>
EV-3488	5/29/19	Chisholm Lateral/ North Spread/ Kingfisher County	No	The Midship Senior Biologist informed the Compliance Monitor that several pieces of equipment had accessed the right-of-way via a road approach that had been closed due to its proximity to an active migratory bird nest. The presence of the active nest was previously documented in EV-3441 on 5/24/19. The activity agitated the bird, which temporarily left the active nest. The Environmental Coordinator later informed the Compliance Monitor that the EI would issue a problem area report for the use of the road approach by the crew. The Compliance Monitor explained that because the area was well marked as being closed, and the actions of the crew placed a sensitive resource at unnecessary risk, the issue should be



SUMMARY OF NONCOMPLIANCE REPORTS FOR THE MIDSHIP PROJECT				
Report Number	Date Issued	Location (Spread or Facility/ Milepost [MP]/ County)	Follow-up Required (Yes or No)	Noncompliance Description
				documented as a noncompliance. Because the Environmental Coordinator would not agree to issue a noncompliance report he was informed that the Compliance Monitor would issue a noncompliance report.
EV-3503	5/31/19	Mainline/ North Spread/ MP 23.10/ Canadian County	Yes	The Compliance Monitor conducted a follow-up site visit of a waterbody crossing in reference to noncompliance reports EV-3414 on May 22, EV-3438 on May 24, EV-3455 on May 25, and EV-3476 on May 28. The Compliance Monitor noted that no corrective measures had been implemented. Pieces of the equipment bridge damaged by previous flood events were still impeding the flow of water. The Compliance Monitor and the EI discussed the ongoing issues. The Compliance Monitor scheduled another follow-up inspection to confirm appropriate corrective measures have been implemented. .
EV-3521	6/1/19	Mainline/ North Spread/ MPs 33.30 to 35.20/ Grady County	Yes	The Compliance Monitor noted severe wind and water erosion of topsoil piles. Eroded topsoil had been deposited onto subsoil in graded areas of the right-of-way. No topsoil stabilization efforts were observed. The Compliance Monitor discussed the issue with the Midship Environmental Coordinator. The Compliance Monitor will conduct a follow-up site visit to confirm appropriate corrective measures have been implemented.
EV-3522	6/1/19	Mainline/ North Spread/ MPs 38.90 to 39.90/ Grady County	Yes	The Compliance Monitor noted severe wind and water erosion of topsoil piles. Eroded topsoil had been deposited onto subsoil in graded areas of the right-of-way. No topsoil stabilization efforts were observed. The Compliance Monitor discussed the issue with the Midship Environmental Coordinator. The Compliance Monitor will conduct a follow-up site visit to confirm appropriate corrective measures have been implemented.
EV-3524	6/1/19	Mainline/ North Spread/ MPs 12.21 to 12.24/ Grady County	Yes	The Compliance Monitor and the EI conducted a follow-up site visit of a waterbody crossing in response to a communication report (EV-3477) issued on 5/28/19. The Compliance Monitor noted that erosio issues on both sides of the waterbody had not been addressed, and further erosion has occurred since the last site visit. The Compliance Monitor discussed the issue with the EI and scheduled a follow-up inspection of the area to ensure corrective measures have been implemented.
EV-3529	6/1/19	Mainline/ North Spread/ MPs 17.51 to 19.26/ Canadian County	Yes	The Compliance Monitor observed that topsoil piles remained unstabilized and erosion and loss of topsoil was continuing along the right-of-way. The Compliance Monitor discussed the issue with the environmental inspection team and scheduled a follow-up site visit to ensure corrective measures have been implemented.
EV-3532	6/1/19	Mainline/ North Spread/	Yes	The Compliance Monitor observed an overwhelmed erosion control device which allowed sediment to travel off



Midcontinent Supply Header Interstate Pipeline Project, Docket No.: CP17-458-000
 Environmental Compliance Monitoring Program
 May 26 through June 1, 2019 Summary Report

SUMMARY OF NONCOMPLIANCE REPORTS FOR THE MIDSHIP PROJECT

Report Number	Date Issued	Location (Spread or Facility/ Milepost [MP]/ County)	Follow-up Required (Yes or No)	Noncompliance Description
		MP 39.00/ Grady County		the right-of-way and enter a sensitive resource. The Midship Environmental Coordinator was informed that a noncompliance report would be issued. The Compliance Monitor scheduled a follow-up site visit to ensure corrective measures have been implemented.



View of issue documented in EV-3476: overwhelmed erosion control device. North Spread, MP 24.5.

**PROBLEM AREA REPORTS**

Problem area reports record an observation where an area or activity does not meet the definition of acceptable but is not considered a noncompliance. Six problem area reports were issued by the Compliance Monitors during this period, as detailed below.

SUMMARY OF PROBLEM AREA REPORTS FOR THE MIDSHIP PROJECT				
Report Number	Date Issued	Location (Spread or Facility/ MP/ County)	Follow-up Required (Yes or No)	Problem Area Description
EV-3413	5/22/19	Mainline/ North Spread/ MPs 12.22 to 18.23/ Canadian County	Yes	The Compliance Monitor observed sediment and construction related materials in sensitive resources and off right-of-way areas at five waterbody and three wetland crossings. Failure of erosion control devices and bridges impeding the flow of water were observed at several of these locations. The deficiencies were relayed to the environmental inspection team. The Compliance Monitor will conduct a follow-up site inspection to ensure corrective measures have been completed.
EV-3418	5/22/19	Mainline/ North Spread/ MP 39.30/ Grady County	Yes	The Compliance Monitor conducted a post-rain event site visit at a waterbody crossing and noted the bridge was impeding the flow of water and also not anchored in place. The Compliance Monitor discussed these issues with the Lead EI. The Compliance Monitor scheduled a follow-up site visit to confirm corrective measures have been completed.
EV-3428	5/23/19	Mainline/ North Spread/ MPs 17.26 to 17.62/ Canadian County	Yes	The Compliance Monitor noted that topsoil and subsoil piles were beginning to mix due to stormwater erosion. The Compliance Monitor also observed that a large amount of topsoil had washed off the right-of-way in the same area. Soil piles must be segregated and stabilized to prevent further mixing and erosion. The Compliance Monitor relayed the observation to the environmental inspection team and scheduled a follow-up site inspection to ensure corrective measures have been implemented.
EV-3444	5/24/19	Mainline/ North Spread/ MP 6.71/ Canadian County	Yes	The Compliance Monitor conducted a follow-up site visit in response to a problem report (EV-3413) issued on 5/22/19 for the failure of erosion control devices, sediment entering a waterbody, and a bridge impeding the flow of water. The Compliance Monitor observed that sediment had not been removed from the waterbody and some of the newly installed erosion control devices were inadequate. Additionally, the Compliance Monitor observed that the bridge still needed to be repaired and re-installed at a higher level. The Compliance Monitor informed the EI of the existing issues that had not been adequately addressed. The EI informed the contractor environmental coordinator of the remaining deficiencies. The Compliance Monitor scheduled a follow-up site visit to confirm corrective measures have been completed.

**SUMMARY OF PROBLEM AREA REPORTS FOR THE MIDSHIP PROJECT**

Report Number	Date Issued	Location (Spread or Facility/ MP/ County)	Follow-up Required (Yes or No)	Problem Area Description
EV-3445	5/24/19	Mainline/ North Spread/ MP 19.26/ Canadian County	Yes	The Compliance Monitor conducted a follow-up site visit in response to a problem area report (EV-3338) issued on 5/14/19, a problem area report (EV-3413) issued on 5/22/19, and a communication report (EV-3431) issued on 5/23/19 for rocks which had been displaced from a road approach into a wetland. The Compliance Monitor observed that the displaced rocks had been removed from the roadside ditch; but they had not been removed from the wetland. The Compliance Monitor will conduct another follow-up site visit to ensure all corrective measures have been completed. The Compliance relayed the observation to the environmental inspection team and scheduled a follow-up site inspection to ensure corrective measures have been implemented.
EV-3457	5/25/19	Mainline/ North Spread/ MP 20.02/ Canadian County	No	The Compliance Monitor observed three project-related vehicles parked off the right-of-way. No damages to sensitive resulted from the vehicles parked off the right-of-way. The environmental inspection team was notified of the issue.



View of issue documented in EV-3413: damaged bridge that needs to be removed from waterbody. North Spread, milepost 12.22.



NONCOMPLIANCE REPORTS

Noncompliance reports record an observation where an area or activity violates (is not in compliance with) the project specifications, results in damage to resources, or places sensitive resources at unnecessary risk. Eleven noncompliance reports were issued by the Compliance Monitors and/or compliance management team during this period, as detailed below.

SUMMARY OF NONCOMPLIANCE REPORTS FOR THE MIDSHIP PROJECT				
Report Number	Date Issued	Location (Spread or Facility/ Milepost [MP]/ County)	Follow-up Required (Yes or No)	Noncompliance Description
EV-3414	5/22/19	Mainline/ North Spread/ MPs 12.90 to 25.54/ Canadian County	Yes (The Compliance Monitor conducted follow-up site visits of multiple waterbodies and wetlands in response to previous reports issued for bridges that impeded water flow and were damaged or swept away during past rain events and for failure to properly design, install, and maintain adequate erosion control devices. These issues were previously documented in EV-3193 on 4/27/19, EV-3290 on 5/9/19, EV-3293 on 5/10/19, EV-3325 on 5/13/19, EV-3340 and EV-3339 on 5/14/19, and EV-3390 on 5/18/19). The Compliance Monitor observed that seven of these waterbody crossings remained non-compliant as the bridges were rebuilt at the same height and would continue to impede high water flows. Additionally, the Compliance Monitor noted that some bridge material that had been swept downstream was still impeding the flow of water and needed to be removed. The Compliance Monitor also observed that some erosion control devices had been repaired, but issues with erosion control devices still needed to be addressed.
EV-3417	5/22/19	Mainline/ North Spread/ MP 43.60/ Grady County	Yes	The Compliance Monitor conducted a post rain event follow-up site visit at a waterbody crossing in response to the noncompliance report EV-3363 issued on 5/16/19 for failure to maintain adequate erosion control devices. On 5/18/19, a problem area report (EV-3395) was also issued for failure to design and maintain a bridge to pass the highest water flow expected to occur while the bridge is in place. The bridge sustained damaged from the most recent rain event and was impeding the water flow. Erosion control devices in the vicinity had not been properly maintained and had allowed sediment to enter the waterbody and other off right-of-way areas. These issues were discussed with the Lead EI, and the Compliance Monitor scheduled another follow-up site visit to ensure all corrective measures are completed.
EV-3419	5/22/19	Mainline/ North Spread/ MPs 6.71 to 25.54/ Canadian County	Yes	The Compliance Monitor conducted a follow-up site visit in response to EV-3344 issued on 5/14/19 for failure to stabilize topsoil and prevent erosion. The issue had not been fully addressed for all locations along the right-of-way. The Compliance Monitor noted that the erosion of topsoil due to insufficient stabilization remains an ongoing issue and discussed it with the Lead EI.



SUMMARY OF NONCOMPLIANCE REPORTS FOR THE MIDSHIP PROJECT				
Report Number	Date Issued	Location (Spread or Facility/ Milepost [MP]/ County)	Follow-up Required (Yes or No)	Noncompliance Description
EV-3420	5/23/19	Mainline/ South Spread/ MPs 194.70 to 194.90/ Bryan County	Yes	The Compliance Monitor observed that subsoil was placed on topsoil piles without adequate separation or barriers. The issue was discussed with the environmental inspection team, and the Compliance Monitor scheduled follow-up site visit to ensure all corrective measures are completed.
EV-3421	5/23/19	Mainline/ South Spread/ MPs 194.40 to 194.80/ Bryan County	Yes	The Compliance Monitor observed that subsoil off the right-of-way at two locations. The issue was discussed with the environmental inspection team, and the Compliance Monitor scheduled follow-up site visit to ensure all corrective measures are completed.
EV-3422	5/23/19	Mainline/ South Spread/ MP 194.60/ Bryan County	Yes	The Compliance Monitor observed sediment overwhelming erosion control devices at a bridge crossing allowing sediment to enter a waterbody. The issue was discussed with the environmental inspection team, and the Compliance Monitor scheduled follow-up site visit to ensure all corrective measures are completed.
EV-3438	5/24/19	Mainline/ North Spread/ MPs 23.10 to 25.54/ Canadian County	Yes	The Compliance Monitor conducted another follow-up site visit to three waterbody crossings referenced in the noncompliance report EV-3414 on 5/22/19 for bridges damaged by previous rain events and impeding water flow. Dislocated mats had not been removed from waterbodies and were still impeding water flow at all three locations. No activities have been initiated by the contractor to address these issues since the 5/22/19 noncompliance report. The issue was discussed with the environmental inspection team. The Compliance Monitor scheduled daily site visits until all corrective measures have been completed.
EV-3453	5/24/19	Mainline/ North Spread/ MPs 6.71 to 26.08/ Canadian County	Yes	The Compliance Monitor observed severe erosion and loss of topsoil due to the lack of stabilization. The issue was discussed with the environmental inspection team, and the Compliance Monitor scheduled follow-up site visit to ensure all corrective measures are completed.
EV-3462	5/24/19	Mainline/ North Spread/ MP 44.40/ Grady County	Yes	The Compliance Monitor conducted a follow-up site visit in response to a noncompliance report (EV-3372) issued on 5/16/19 for failure to maintain erosion control devices along an access road which allowed sediment to migrate off right-of-way and enter a sensitive resource. The Compliance Monitor observed that erosion control devices were still not being maintained properly and allowing sediment to continue to travel off right-of-way and enter the sensitive resource. The Compliance Monitor discussed the incident with the EI and informed him a second noncompliance report was being issued. The Compliance Monitor scheduled another follow-up site visit to ensure corrective measures have been completed and the issue has been properly addressed.



Midcontinent Supply Header Interstate Pipeline Project, Docket No.: CP17-458-000
 Environmental Compliance Monitoring Program
 May 19 through 25, 2019 Summary Report

SUMMARY OF NONCOMPLIANCE REPORTS FOR THE MIDSHIP PROJECT

Report Number	Date Issued	Location (Spread or Facility/ Milepost [MP]/ County)	Follow-up Required (Yes or No)	Noncompliance Description
EV-3455	5/25/19	Mainline/ North Spread/ MPs 23.10 to 24.65/ Canadian County	Yes	The Compliance Monitor conducted another follow-up site visit to three waterbody crossings referenced in a noncompliance report (EV-3438) issued on 5/24/19 for bridges damaged by previous rain events and impeding water flow. The Compliance Monitor noted that the dislocated mats had not been removed from two of the waterbodies and continued to severely impede water flow. However, mats and other project materials had been removed from the third waterbody and flow at that crossing was no longer impeded. The Compliance Monitor also observed failed erosion control devices at all three locations. The issues were discussed with the environmental inspection team, and the Compliance Monitor scheduled another follow-up site visit to ensure all corrective measures are completed.
EV-3461	5/25/19	Mainline/ North Spread/ MP 17.51/ Canadian County	Yes	The Compliance Monitor conducted a follow-up site visit in response to a problem area report (EV-3428) issued on 5/23/19 for failure to properly segregate and stabilize topsoil and subsoil piles. The Compliance Monitor observed that the topsoil pile continued to be eroded due to a lack of stabilization. The Compliance Monitor discussed the ongoing issue with the EI. The Compliance Monitor scheduled a follow-up site visit to ensure the issue had been addressed.

**PROBLEM AREA REPORTS**

Problem area reports record an observation where an area or activity does not meet the definition of acceptable but is not considered a noncompliance. Fifteen problem area reports were issued by the Compliance Monitors during this period, as detailed below.

SUMMARY OF PROBLEM AREA REPORTS FOR THE MIDSHIP PROJECT				
Report Number	Date Issued	Location (Spread or Facility/ MP/ County)	Follow-up Required (Yes or No)	Problem Area Description
EV-3323	5/13/19	Mainline/ North Spread/ MPs 9.51 to 9.68/ Canadian County	Yes	The Compliance Monitor noted that the subsoil piles had been placed directly adjacent to the topsoil piles with no space or barrier in between on the east side of North Red Rock Road, which could result in topsoil/subsoil mixing during future rain events if not promptly addressed. The Compliance Monitor will conduct follow-up inspections to verify that the issue has been resolved.
EV-3327	5/13/19	Mainline/ South Spread/ MPs 140.00 to 141.30/ Johnston County	No	During clearing and burning activities on the-right-of-way, the Compliance Monitor noted an unintended fire that burned a 25-foot-square off-right-of-way area. The crew immediately contained the fire.
EV-3331	5/13/19	Mainline/ North Spread/ MP 43.60/ Grady County	Yes	The Compliance Monitor noted that the sediment that previously entered a waterbody buffer zone had been left in place and seeded, and that additional sediment had entered the buffer zone due to failed erosion and sediment control devices. No sediment had entered the adjacent waterbody at the time of observation. The Compliance Monitor informed the Lead EI that a problem area report would be issued to document a failure to remove sediment from the waterbody buffer and to repair/ maintain erosion control devices (see also noncompliance report EV-3363, dated May 16, 2019).
EV-3336	5/14/19	Mainline/ North Spread/ MPs 17.26 to 17.50/ Canadian County	Yes	The Compliance Monitor noted that many erosion control devices near a waterbody and wetland were either not properly installed or have not been properly maintained despite several previous communications regarding these issues. In addition, off-right-of-way sediment has not been retrieved despite prior approval of a variance to access the off-right-of-way areas for that purpose. The Compliance Monitor will continue to monitor the site until the issues have been resolved.
EV-3337	5/14/19	Mainline/ North Spread/ MPs 18.22 to 18.23/ Canadian County	Yes	The Compliance Monitor noted that, while repairs had been made at many previously identified erosion control device deficiencies following the last rain event, many still required maintenance to be fully functional. In addition, a large amount of sediment was present on the bridge across a waterbody. These issues will need to be addressed prior to the waterbody/wetland crossing scheduled for the following day to prevent sediment from entering the resources. The Compliance Monitor will continue to monitor the site to verify that all sensitive resources are adequately protected.



SUMMARY OF PROBLEM AREA REPORTS FOR THE MIDSHIP PROJECT				
Report Number	Date Issued	Location (Spread or Facility/ MP/ County)	Follow-up Required (Yes or No)	Problem Area Description
EV-3338	5/14/19	Mainline/ North Spread/ MP 19.31/ Canadian County	Yes	During a follow-up inspection near a waterbody and wetland, the Compliance Monitor and the Lead EI noted that erosion control devices were still in need of maintenance/repair and the off-right-of-way mats had not been retrieved despite an approved variance granting access to the off-right-of-way areas. The Compliance Monitor will continue to monitor the site until the issues have been resolved.
EV-3339	5/14/19	Mainline/ North Spread/ MPs 19.93 to 20.02/ Canadian County	Yes	The Compliance Monitor and the Lead EI noted that several previously identified issues had not been corrected, including overwhelmed/damaged erosion control devices, a partially obstructed flume pipe, and an area of erosion resulting in sediment entering a waterbody. The Compliance Monitor will continue to monitor the site until the issues have been resolved.
EV-3340	5/14/19	Mainline/ North Spread/ MP 23.10/ Canadian County	Yes	The Compliance Monitor and the Lead EI noted that previously identified erosion control device deficiencies had not been repaired leaving the waterbody unprotected, and off-right-of-way mats had not been retrieved despite an approved variance to access the off-right-of-way area. The Compliance Monitor will continue to monitor the site until the issues have been resolved.
EV-3341	5/14/19	Mainline/ North Spread/ MP 24.65/ Canadian County	Yes	The Compliance Monitor and the Lead EI noted erosion control device deficiencies near a waterbody crossing that required repair/maintenance to prevent sediment from entering the sensitive resource. The Compliance Monitor will continue to monitor the site until the issues have been resolved.
EV-3344	5/14/19	Mainline/ North Spread/ MP 22.72/ Canadian County	Yes	The Compliance Monitor and the Lead EI noted ongoing erosion of the topsoil pile on the right-of-way during rain events due to improper soil stabilization. Topsoil erosion continues to be an issue of concern along the North Spread.
EV-3349	5/15/19	Chisholm Lateral/ North Spread/ MP 5.90/ Kingfisher County	No	The Compliance Monitor and a representative from Midship's senior management team noted that previously identified deficiencies at the bridge over a waterbody had not yet been addressed and the bridge continued to impede stream flow. This information was communicated to the contractor's environmental manager. At the time of the Compliance Monitor's subsequent follow-up inspection, the bridge had been re-installed at an acceptable height (see communication report EV-3366, dated May 16, 2019).
EV-3355	5/15/19	Mainline/ South Spread/ MPs 164.80 to 167.20/ Johnston County	No	The Compliance Monitor noted a bulldozer crossing a road without adequate protection of the road surface in place, which has been a repeat issue along the South Spread. The Compliance Monitor and Lead EI discussed measures to address the issue.



SUMMARY OF PROBLEM AREA REPORTS FOR THE MIDSHIP PROJECT				
Report Number	Date Issued	Location (Spread or Facility/ MP/ County)	Follow-up Required (Yes or No)	Problem Area Description
EV-3359	5/16/19	Mainline/ South Spread/ MPs 120.00 to 121.20/ Carter County	No	The Compliance Monitor noted inadequate secondary containment under a pump located within 100 feet of a waterbody. No impact on the resource had occurred. The Compliance Monitor notified the Lead EI who requested that the contractor address the issue.
EV-3375	5/17/19	Mainline/ North Spread/ MPs 9.68 to 10.23/ Canadian County	No	The Compliance Monitor noted that subsoil was beginning to encroach upon the topsoil pile during welding activities. The Lead EI and EI were notified, and the topsoil and subsoil were adequately segregated prior to the end of the day.
EV-3395	5/18/19	Mainline/ North Spread/ MP 43.60/ Grady County	Yes	Following an overnight rain event, the Compliance Monitor observed that water had overtopped a bridge over a waterbody and dislodged some of the mats. Debris and tree limbs had subsequently collected between the mats and the bridge decking, trapping additional debris on the upstream side of the bridge. The Lead EI was informed that a problem area report would be issued for a failure to design and maintain a bridge to allow unimpeded stream flow. The Compliance Monitor scheduled a follow-up site visit for the following week.



EV-3323 – View of topsoil and subsoil with no space/barrier between to maintain separation, Mainline, North Spread, MPs 9.51 to 9.68.



NONCOMPLIANCE REPORTS

Noncompliance reports record an observation where an area or activity that violates (is not in compliance with) the project specifications, results in damage to resources, or places sensitive resources at unnecessary risk. Seven noncompliance reports were issued by the Compliance Monitors during this period, as detailed below.

SUMMARY OF NONCOMPLIANCE REPORTS FOR THE MIDSHIP PROJECT				
Report Number	Date Issued	Location (Spread or Facility/Milepost [MP]/ County)	Follow-up Required (Yes or No)	Noncompliance Description
EV-3334	5/14/19	Mainline/ South Spread/ MP 182.00 to 191.50/ Bryan County	Yes	The Compliance Monitor issued a noncompliance report to document rutting at the right-of-way crossing of public and private roads, and in other off-right-of-way areas, caused by equipment traffic and vehicle parking when ground conditions were saturated and muddy. Rutting has been an ongoing issue and the subject of a previous problem area report issued in April 2019.
EV-3345	5/14/19	Mainline/ North Spread/ MP 30.70/ Canadian County	Yes	The Compliance Monitor issued a noncompliance report to document sediment entering a waterbody due to erosion control device deficiencies, which is out of compliance with section V.B.10 of the FERC's Procedures and section IV.F.3.C of the FERC's Upland Erosion Control Revegetation and Maintenance Plan (Plan). The Lead EI was notified that a noncompliance report would be issued (see noncompliance report EV-3394, dated May 18, 2019, for more information).
EV-3351	5/15/19	Mainline/ North Spread/ MP 18.22/ Canadian County	Yes	The Compliance Monitor issued a noncompliance report to document a failure to maintain stream flow at the site of planned dam-and-pump waterbody crossing, rutting in the associated wetland, and sediment in both the waterbody and wetland. The dams had been installed in the stream in preparation for the waterbody crossing but no pumps were operating to maintain stream flow because no pump hoses were on site and available for use at the time. In addition, construction equipment was causing rutting in the wetland due to an insufficient supply of mats on site and sediment was visible in both the wetland and waterbody due to construction activities. These activities are out of compliance with the FERC's Procedures. The Lead EI requested that an EI be stationed at the site, all equipment was removed from the waterbody and wetland, and erosion controls were re-installed. A second attempt at the waterbody crossing was scheduled for the following day (see also noncompliance report EV-3369, dated May 16, 2019).



SUMMARY OF NONCOMPLIANCE REPORTS FOR THE MIDSHIP PROJECT				
Report Number	Date Issued	Location (Spread or Facility/Milepost [MP]/ County)	Follow-up Required (Yes or No)	Noncompliance Description
EV-3363	5/16/19	Mainline/ North Spread/ MP 43.60/ Grady County	Yes	The Compliance Monitor issued a noncompliance report to document inadequate/incomplete repairs to previously identified erosion control device deficiencies and a failure to remove sediment from the waterbody buffer, which is out of compliance with the FERC's Procedures. This is the site of a previous problem area report issued for the same reasons (see problem area report EV-3331, dated May 13, 2019). The Compliance Monitor discussed the issues with the EI and scheduled a follow-up inspection for the following week to verify that the issues have been resolved.
EV-3369	5/16/19	Mainline/ North Spread/ MP 18.18/ Canadian County	Yes	The Compliance Monitor issued a noncompliance report to document topsoil and subsoil mixing that occurred at the site of the unsuccessful waterbody/wetland crossing attempted the previous day (see noncompliance report EV-3351, dated May 15, 2019). The topsoil/subsoil mixing occurred when subsoil was placed directly on top of a topsoil pile with no separation/barrier between the soils. This activity is out of compliance with section IV.B of the FERC's Plan. The Lead EI was notified. The Compliance Monitor will continue to monitor this waterbody crossing site until the issues have been resolved.
EV-3372	5/16/19	Mainline/ North Spread/ MP 44.40/ Grady County	Yes	The Compliance Monitor issued a noncompliance report to document sediment entering an off-right-of-way lake/waterbody due to non-functional erosion control devices near the intersection of an access road and the right-of-way, which is out of compliance with section V.B.10 of the FERC's Procedures. The Compliance Monitor and the EI discussed the issues at the site. The Compliance Monitor will continue to monitor the site until the issues have been resolved.
EV-3394	5/18/19	Mainline/ North Spread/ MP 30.70/ Grady County	Yes	During a follow-up site inspection of the site of a previous noncompliance issued for sediment entering a waterbody due to erosion control device deficiencies (see noncompliance report EV-3345, dated May 14, 2019), the Compliance Monitor noted that no repairs to the erosion control devices had been made and the sediment remained in the waterbody. The Compliance Monitor issued a second noncompliance report to document the failure to maintain or repair erosion control devices within 24 hours of identification, which is out of compliance with section II.B.14 of the FERC's Plan. The Compliance Monitor will continue to monitor the site until the issues have been resolved.

**PROBLEM AREA REPORTS**

Problem area reports record an observation where an area or activity does not meet the definition of acceptable but is not considered a noncompliance. Four problem area reports were issued by the Compliance Monitors during this period, as detailed below.

SUMMARY OF PROBLEM AREA REPORTS FOR THE MIDSHIP PROJECT				
Report Number	Date Issued	Location (Spread or Facility/ Milepost (MP)/ County)	Follow-up Required (Yes or No)	Problem Area Description
EV-3272	5/7/19	Mainline/ North Spread/ MPs 2.08 to 2.75/ Canadian County	No	The Compliance Monitor noted that subsoil had been placed directly on top of the topsoil pile with no physical barrier in place resulting in topsoil/subsoil mixing on the northern side of 220 th Street NW. Because the topsoil and subsoil could be easily separated at this location and equipment was promptly brought to the site to start addressing the issue, the Compliance Monitor documented the topsoil/subsoil mixing as a problem area.
EV-3275	5/7/19	Mainline/ North Spread/ MPs 18.22 to 18.23/ Canadian County	No	The Compliance Monitor noted that numerous erosion control devices had failed and severe erosion had occurred, resulting in sediment again entering wetland WCN-005 and waterbody SCN-013 following a rain event. The Compliance Monitor and EI discussed that the issues at the site need to be addressed as soon as possible because more rain was in the forecast. A crew arrived on site to start addressing the issues.
EV-3290	5/9/19	Mainline/ North Spread/ MP 30.70/ Grady County	No	The Compliance Monitor noted that water had flowed up and over the equipment bridge crossing waterbody SGR-029 damaging the side shields and geotextile fabric on the bridge. In addition, debris was trapped on the upstream side of the bridge. The Compliance Monitor notified the Lead EI that a problem area report was being issued to document a failure to design and maintain the equipment bridge to withstand the highest expected flow. At the time of the Compliance Monitor's subsequent follow-up inspection, appropriate corrective measures had been implemented to address the issues at the bridge.
EV-3299	5/10/19	Mainline/ South Spread/ MPs 140.00 to 141.50/ Johnston County	No	The Compliance Monitor noted that several sapling trees had been cut from an off-right-of-way upland area during tree felling activities. The Compliance Monitor notified the EI and issued a problem area report to document the issue. The EI addressed the issue with the clearing crew.

**NONCOMPLIANCE REPORTS**

Noncompliance reports record an observation where an area or activity that violates (is not in compliance with) the project specifications results in damage to resources or places sensitive resources at unnecessary risk. Three noncompliance reports were issued by the Compliance Monitors during this period, as detailed below.

SUMMARY OF NONCOMPLIANCE REPORTS FOR THE MIDSHIP PROJECT				
Report Number	Date Issued	Location (Spread or Facility/ Milepost [MP]/ County)	Follow-up Required (Yes or No)	Noncompliance Description
EV-3257	5/6/19	Mainline/ North Spread/ MPs 13.00 to 13.26/ Grady County	Yes	The Compliance Monitor issued a noncompliance report to document erosion and sediment entering waterbody SCN-015 during a rain event due to a failure to repair previously identified erosion control device deficiencies, which is out of compliance with section V.B.10 of the Wetland and Waterbody Construction and Mitigation Procedures (Procedures). This site has been the subject of several previous noncompliance reports for impacts on the waterbody due to ineffective/deficient erosion control devices. As of the end of this reporting period, the issues at the site were ongoing.
EV-3261	5/6/19	Chisholm Lateral/ North Spread/ MPs 20.40 to 20.43/ Canadian County	No	The Compliance Monitor issued a noncompliance report to document topsoil/subsoil mixing that occurred when subsoil was placed directly on the topsoil during mud removal/cleanup activities, which is out of compliance with section IV.B of the Upland Erosion Control, Revegetation, and Maintenance Plan (Plan). The EI was notified and crewmembers used shovels to begin separating the topsoil and subsoil the same day.
EV-3273	5/7/19	Mainline/ North Spread/ MPs 17.26 to 17.51/ Canadian County	No	The Compliance Monitor issued a noncompliance report to document ongoing and previously identified compliance issues that were either not addressed in a timely manner or not properly corrected north of Smith Road, including a failure to repair or adequately repair previously identified erosion control device deficiencies and ongoing loss of topsoil due to erosion issues not addressed after previous identification. These issues are out of compliance with sections II.B.14 and IV.B.6 of the Plan and section V.B.10 of the Procedures. The issues at the site were addressed the following week following additional site meetings/inspections with the Lead EI present to review the compliance concerns.

**PROBLEM AREA REPORTS**

Problem Area Reports record an observation where an area or activity does not meet the definition of acceptable but is not considered a noncompliance. Four Problem Area Reports were issued by the Compliance Monitors during this period, as detailed below.

SUMMARY OF PROBLEM AREA REPORTS FOR THE MIDSHIP PROJECT				
Report Number	Date Issued	Location (Spread or Facility/ MP/ County)	Follow-up Required (Yes or No)	Problem Area Description
EV-3216	4/30/19	Mainline / South Spread / MP 187.70 to 188.30 Bryan County	Yes	The Compliance Monitor observed that sediment was deposited off-right-of-way during previously completed trench dewatering activities. The Compliance Monitor informed the EI of the off-right-of-way sediment. The EI addressed the issue with the contractor. The Compliance Monitor scheduled a follow-up inspection of the area.
EV-3217	4/30/19	Mainline / South Spread / MP 187.80 to 189.00 Bryan County	Yes	The Compliance Monitor observed damage to several roadways consistent with tracked equipment and observed piece of tracked equipment crossing a road with no track support causing damage to the roadway. The Compliance Monitor, the EI and the Midship Safety Supervisor discussed the issue and the areas where repairs were needed to the roadways. The EI addressed the issue with the contractor and the Compliance Monitor scheduled a follow-up inspection of the area.
EV-3234	5/2/19	Mainline / South Spread / MP 138.80 to 199.60 Johnston County	Yes	The Compliance Monitor observed erosion control devices in need of maintenance and several waterbody bridges washed off the right-of-way following a multiple day rain even. The Compliance Monitor discussed the observations with the environmental inspection staff. The contractor and EI staff are prioritizing an action item list to address issues.
EV-3238	5/3/19	Mainline / North Spread / MP 35.58 Grady County	Yes	The Compliance Monitor and the Lead EI discussed the loose straw that was left on the banks of a waterbody. The Lead EI addressed the issue with the contractor. The Compliance Monitor scheduled a follow-up inspection.

**NONCOMPLIANCE REPORTS**

Noncompliance Reports record an observation where an area or activity that violates (is not in compliance with) the Project specifications, results in damage to resources, or places sensitive resources at unnecessary risk. Two Noncompliance Reports were issued by the Compliance Monitors during this period, as detailed below.

SUMMARY OF NONCOMPLIANCE REPORTS FOR THE MIDSHIP PROJECT				
Report Number	Date Issued	Location (Spread or Facility/Milepost [MP]/ County)	Follow-up Required (Yes or No)	Noncompliance Description
EV-3210	4/29/19	Mainline / North Spread / MP 12.51 to 13.26/ Canadian County	Yes	The Compliance Monitor re-inspected an area where a problem area report (EV-3156) and several noncompliance reports (EV-2992, EV-3015, EV-3193, and EV-3194) had been issued and noted inadequate erosion control device installation and topsoil mixing with the subsoil. The Compliance Monitor, the lead EI and the EI discussed the observed issues. The Lead EI addressed the issues with the contractor and the Compliance Monitor scheduled a follow-up inspection of the area.
EV-3237	5/3/19	Mainline / North Spread / MP 34.75 to 35.77/ Grady County	Yes	The Compliance Monitor and the Lead EI inspected a waterbody and wetland area where a large portion of the bank had collapsed into the waterbody (previously reported in EV-3161). The Compliance Monitor observed that the bridge had been repaired but the bank had not been stabilized and continued to erode during each subsequent storm event. The Compliance Monitor observed that the erosion control devices were inadequately protecting the wetland and waterbody, mulch and erosion control devices were installed within the wetland and needed to be removed, and pieces of damaged mats were observed within the wetland. All observed issues were discussed with the Lead EI. The Lead EI addressed the issues with the contractor and the Compliance Monitor scheduled a follow-up inspection of the area.

**PROBLEM AREA REPORTS**

Problem area reports record an observation where an area or activity does not meet the definition of acceptable but is not considered a noncompliance. Five Problem Area Reports were issued by the Compliance Monitors during this period, as detailed below.

SUMMARY OF PROBLEM AREA REPORTS FOR THE MIDSHIP PROJECT				
Report Number	Date Issued	Location (Spread or Facility/ MP/ County)	Follow-up Required (Yes or No)	Problem Area Description
EV-3142	4/22/19	Chisholm Lateral / North Spread / MP 10.39 to 10.47 Kingfisher	Yes	The Compliance Monitor observed the area around a wetland as a follow up to the EI-issued noncompliance report (EV-3139 on 4/20/19). Although crews had moved parked equipment out of the buffer zone, no-refueling signage was still in the wrong location. The Compliance Monitor informed the EI and the Lead EI that a problem area report would be issued. See communication report EV-3174 on 4/26/19 for follow-up.
EV-3160	4/25/19	Mainline / North Spread / MP 52.70 Grady County	Yes	The Compliance Monitor performed a follow-up site visit near a waterbody in reference to the communication report EV-3089 on 4/15/19; the FERC inspection on 4/17/19; and the communication report EV-3124 on 4/19/19. Although the bridge had been re-installed at a higher level and numerous erosion control devices had been installed throughout the area, mulch had been placed on the bank of the waterbody without being properly anchored. In addition, a section of right-of-way near the bridge on the north side was not adequately protected by erosion control devices, potentially allowing sediment onto the bridge and into the waterbody. The Compliance Monitor informed the Lead EI that a problem area report would be issued.
EV-3195	4/27/19	Mainline / North Spread / MP 12.21 to 12.24 Canadian County	Yes	The Compliance Monitor observed a waterbody crossing, noting that the bridge had been rebuilt after the last rain event and erosion control devices had been reinstalled. However, many of the erosion control devices were already damaged and would likely not provide adequate protection during a large rain event. Also, no-refueling signage was missing on the northern side of the waterbody buffer. The Compliance Monitor notified the Lead EI that a problem area report will be issued and that these items should be addressed prior to the next rain event.
EV-3196	4/27/19	Mainline / Calumet Compressor Station / North Spread / MP 17.51 Canadian County	Yes	The Compliance Monitor observed that deficiencies in erosion control devices at the Calumet Compressor Station and on the mainline right-of-way had not been adequately addressed. Twice before, observations indicated that stormwater exiting the compressor station site onto the right-of-way caused erosion of a topsoil pile and sedimentation into a roadside ditch. Crews did relocate some of the topsoil pile and stabilized the remaining portion left in place. Topsoil piles were then labeled to reduce confusion. The Compliance Monitor informed the Lead EI that a problem area report would be issued regarding the inadequately addressed stormwater issue.



SUMMARY OF PROBLEM AREA REPORTS FOR THE MIDSHIP PROJECT

Report Number	Date Issued	Location (Spread or Facility/ MP/ County)	Follow-up Required (Yes or No)	Problem Area Description
EV-3197	4/27/19	Mainline / North Spread / MP 18.22 to 18.23 Canadian County	Yes	The Compliance Monitor conducted a follow-up site visit to a wetland and waterbody area in reference to an EI-issued problem area report (documented in communication report EV-3158 on 4/24/19). The Compliance Monitor observed that straw mulch was used within a wetland, which is out of compliance with the FERC Procedures. This had previously been discussed with the EI on April 24, 2019. The Compliance Monitor informed the EI that a problem area report would be issued.



EV-3142 – View of wetland with the required environmental signage in the wrong location.
 North Spread, Chisholm Lateral, MP 10.39

**NONCOMPLIANCE REPORTS**

Noncompliance Reports record an observation where an area or activity that violates (is not in compliance with) the Project specifications, results in damage to resources, or places sensitive resources at unnecessary risk. Four Noncompliance reports were issued by the Compliance Monitors during this period, as detailed below.

SUMMARY OF NONCOMPLIANCE REPORTS FOR THE MIDSHIP PROJECT				
Report Number	Date Issued	Location (Spread or Facility/Milepost [MP]/ County)	Follow-up Required (Yes or No)	Noncompliance Description
EV-3146	4/22/19	Mainline / North Spread / MP 16.89 Canadian County	Yes	The Compliance Monitor observed a waterbody crossing and noted that erosion control devices were not properly installed at the end of the day. Also, a no-refueling sign was missing and several other erosion control devices needed repairs. The Compliance Monitor notified the Lead EI that a noncompliance report would be issued.
EV-3163	4/25/19	Mainline / North Spread / MP N/A	No	The Compliance Monitor observed numerous construction-related vehicles parked in a partially grass and partially gravel/dirt covered area off right-of-way. The Compliance Monitor informed the Lead EI that a noncompliance report would be issued. This is the second noncompliance report issued to this contractor for parking in an unapproved location.
EV-3193	4/27/19	Mainline / North Spread / MP 12.51 to 13.26 Canadian County	Yes	The Compliance Monitor conducted a follow-up site visit in reference to noncompliance reports EV-2992 and EV-3015 issued on 4/6/19 and 4/9/19, respectively and an EI issued a problem area report as documented in EV-3156 on 4/24/19. Numerous ineffective erosion control devices were still observed in the area, including erosion control devices that were either improperly installed or repaired. A bridge that the EI previously noted should be raised to prevent impeding the flow of water had not been adjusted. Other erosion control devices that have failed in the past were reinstalled in the same way without any adjustments or improvements. Sediment deposited off right-of-way had not been removed. The Compliance Monitor met with the Lead EI on site who agreed with the assessment. The Compliance Monitor issued a noncompliance report and stated to the Lead EI that the repairs should be completed prior to the next rain event. The Lead EI then described all the deficiencies to the contractor environmental coordinator and utility inspectors during a subsequent site visit.
EV-3194	4/27/19	Mainline / North Spread / MP 12.51 to 13.58 Canadian County	Yes	The Compliance Monitor noted that topsoil had been used to construct water bar, some mixing of topsoil and subsoil had occurred, and topsoil piles were not properly stabilized. The Compliance Monitor met the Lead EI on site and informed him that a noncompliance report would be issued and that these items should be addressed prior to the next rain event.

**PROBLEM AREA REPORTS**

Problem area reports record an observation where an area or activity does not meet the definition of acceptable but is not considered a noncompliance. Twelve problem area reports were issued by the Compliance Monitors during this period, as detailed below.

SUMMARY OF PROBLEM AREA REPORTS FOR THE MIDSHIP PROJECT				
Report Number	Date Issued	Location (Spread or Facility/ MP/ County)	Follow-up Required (Yes or No)	Problem Area Description
EV-3084	4/15/19	Chisholm Lateral/ North Spread/ MP 7.63/ Kingfisher County	Yes	The Compliance Monitor noted improperly installed erosion control devices across the bridge at Clear Creek (SKI-025). No impacts on the waterbody were noted; however, this has been a reoccurring issue at bridges along the North Spread. The Compliance Monitor and EI discussed the reoccurring issue.
EV-3085	4/15/19	Chisholm Lateral/ North Spread/ MP 0.15/ Kingfisher County	Yes	The Compliance Monitor noted that repairs had not been made at the damaged silt fence identified 6 days prior on April 9, 2019. On Friday, April 12, 2019, all construction activities had been halted to attend to erosion control device repair/maintenance issues along the right-of-way and, at that time, the EI had also noted that the repairs had not yet been made. Per sections II.B.13 and 14 of the FERC's Plan, erosion control measures are to be maintained on a weekly basis in areas with no construction or equipment operation, and ineffective erosion control measures are to be repaired within 24 hours of identification.
EV-3088	4/15/19	Mainline/ North Spread/ MP 50.88/ Grady County	Yes	The Compliance Monitor noted several issues at the bridge over waterbody SGR-139 and connected pond SGR-016. The bridge was built over both the waterbody and pond but only the portion above the waterbody was lined with geotextile fabric to prevent material from entering the waterbody/pond. The water level had risen during the recent rain event, flowed onto the bridge surface, and mixed with sediment left on the bridge, resulting in a small amount of sediment entering the pond/waterbody. The bridge should be kept clean at all times to prevent sediment from entering the waterbody/pond.
EV-3093	4/15/19	Mainline/ South Spread/ MPs 146.00 to 199.60/ Bryan County	Yes	The Compliance Monitor noted several locations with off-right-of-way sediment following the rain events earlier in the week. The erosion control devices had not been repaired within the required timeframe. Crews were working to recover the off-right-of-way sediment and installed re-enforced erosion controls where necessary.
EV-3094	4/15/19	Mainline/ North Spread/ MP 51.28/ Grady County	Yes	The Compliance Monitor noted off-right-of-way sediment in a vegetated pasture following the April 13, 2019 rain event. On April 10, 2019, the Compliance Monitor and EI had discussed the need to install erosion control devices at this specific location to prevent sediment from leaving the right-of-way during rain events; however, none had been installed at this location.



SUMMARY OF PROBLEM AREA REPORTS FOR THE MIDSHIP PROJECT				
Report Number	Date Issued	Location (Spread or Facility/ MP/ County)	Follow-up Required (Yes or No)	Problem Area Description
EV-3097	4/16/19	Mainline/ North Spread/ MPs 57.57 to 57.59/ Grady County	Yes	The Compliance Monitor noted a large amount of mulch in waterbodies SGR-041 and SGR-109. The Lead EI had previously instructed the contractor to use erosion control blanket instead of mulch on the bank of waterbodies or, if mulch is used, it would need to be crimped-in to prevent it from being transported into sensitive resources via water and/or wind.
EV-3101	4/17/19	Mainline/ South Spread/ MPs 134.80 to 136.20/ Carter County	Yes	Following discussions with the Lead EI, the Compliance Monitor issued a problem area report to document areas where erosion control devices were in need of repair, sediment had migrated off-right-of-way, and general housekeeping was required (removal of trash/debris).
EV-3111	4/18/19	Mainline/ North Spread/ off-right-of-way/ Canadian County	No	The Compliance Monitor noted project-related vehicles/equipment parked in an unapproved vacant lot. Off-right-of-way vehicle parking has been the subject of recent complaints from landowners along the project. Following discussions with Midship's Lead EI and Environmental Coordinator, it was agreed that project-related vehicles should park within the approved workspace and project-related use of the lot would require an approved variance.
EV-3112	4/18/19	Mainline/ North Spread/ MPs 15.13 to 15.20/ Canadian County	Yes	The Compliance Monitor noted migration of rocks from the rock construction entrance onto State Highway 66. This has been a reoccurring issue and could pose a safety hazard to drivers. This topic has been raised with the environmental inspection staff for corrective action.
EV-3119	4/19/19	Mainline/ North Spread/ MP 61.09/ Grady County	Yes	During a follow-up inspection of the site of a previous noncompliance report issued for bridge installation causing obstruction of flow within a waterbody (see noncompliance report EV-3099 dated April 16, 2019), the Compliance Monitor noted additional/ongoing issues at the site, including erosion control fabric installed within the streambed and mulch that had not been removed from the waterbody. The Compliance Monitor and Lead EI discussed the issues and will continue to monitor/inspect the site until the issues have been addressed.
EV-3121	4/19/19	Mainline/ North Spread/ MPs 57.57 to 57.59/ Grady County	Yes	During a follow-up inspection of the site of a previous problem area report issued for straw scattered on the banks of waterbody SGR-049 and within the riparian zone, the Compliance Monitor noted that the issues at the site had not been addressed and additional straw had migrated into the waterbody and could potentially impede water flow if not removed. The Compliance Monitor and Lead EI discussed the issue and will continue to monitor/inspect the site until the issue has been addressed.



SUMMARY OF PROBLEM AREA REPORTS FOR THE MIDSHIP PROJECT

Report Number	Date Issued	Location (Spread or Facility/ MP/ County)	Follow-up Required (Yes or No)	Problem Area Description
EV-3127	4/19/19	Mainline/ South Spread/ MPs 173.80 to 173.90/ Carter County	No	The Compliance Monitor documented an inadvertent release of drilling mud into a waterbody SBR-083 during 48-inch-diameter reaming activities at the Blue River (SBR-077) HDD. Previously installed sand bags contained the drilling mud. Reaming operations continued with pumps operating to relay the drilling mud to the entry bore pit and the containment effectively preventing migration of the drilling mud downstream of the non-flowing waterbody.



View of improperly installed erosion control device at Clear Creek (SKI-025), Chisholm Lateral, North Spread, milepost 7.63. The Compliance Monitor issued a problem area report to document the reoccurring issue (see EV-3084 dated April 15, 2019).

**NONCOMPLIANCE REPORTS**

Noncompliance reports record an observation where an area or activity violates (is not in compliance with) the project specifications, results in damage to resources, or places sensitive resources at unnecessary risk. Five noncompliance reports were issued by the Compliance Monitors and/or compliance management team during this period, as detailed below.

SUMMARY OF NONCOMPLIANCE REPORTS FOR THE MIDSHIP PROJECT				
Report Number	Date Issued	Location (Spread or Facility/ Milepost [MP]/ County)	Follow-up Required (Yes or No)	Noncompliance Description
EV-3090	4/15/19	Mainline/ North Spread/ Carter , Garvin, and Grady Counties	No	The FERC Third-Party Compliance Manager issued a noncompliance report to document that Midship did not conduct surveys for migratory birds prior to conducting vegetation clearing activities, which is out of compliance with the Migratory Bird Treaty Act and section 4.0 of Midship's Migratory Bird Conservation Plan. Prior to any new vegetation clearing, Midship must conduct preconstruction surveys for migratory birds. In addition, Midship should also conduct surveys on previously cleared areas within migratory bird/eagle habitat to determine if eagles or other migratory birds nesting adjacent to the pipeline require exclusion buffers in accordance with the requirements of the plan.
EV-3095	4/16/19	Mainline/ North Spread/ MP 63.38/ Grady County	Yes	The Compliance Monitor issued a noncompliance report to document sediment entering waterbody SGR-058B due to erosion control device deficiencies and a failure to identify and/or repair damaged erosion control devices within the required timeframe following rain events, which is out of compliance with section II.B of the FERC's Plan and section V.B.10 of FERC's <i>Wetland and Waterbody Construction and Mitigation Procedures</i> (Procedures). The Lead EI confirmed that the issues would be discussed/addressed during the following morning's meeting.
EV-3096	4/16/19	Mainline/ North Spread/ MP 61.89/ Grady County	Yes	The Compliance Monitor issued a noncompliance report to document upland sediment entering a drainage and waterbody SGR-105 due to erosion control device deficiencies, which is out of compliance with section V.B.10 of the Procedures. When the issues were not addressed by the Compliance Monitor's follow-up inspection of the site, the Lead EI issued a second noncompliance to document the ongoing issues (see communication report EV-3118 dated April 19, 2019). Following the second noncompliance, all issues were adequately addressed.
EV-3099	4/16/19	Mainline/ North Spread/ MP 61.09/ Grady County	Yes	The Compliance Monitor issued a noncompliance report to document improper bridge installation impeding flow within a waterbody, which is out of compliance with section V.B.5 of the Procedures (which requires equipment bridges to be constructed and maintained to allow unrestricted flow). In addition, chipped vegetation entered the waterbody further impeding flow. Two previous problem area reports were



SUMMARY OF NONCOMPLIANCE REPORTS FOR THE MIDSHIP PROJECT				
Report Number	Date Issued	Location (Spread or Facility/ Milepost [MP]/ County)	Follow-up Required (Yes or No)	Noncompliance Description
				issued to document the ongoing concerns at this location (EV-3027 and EV-3062, dated April 10 and 12, 2019). The Compliance Monitor and Lead EI have discussed the ongoing issues and will continue to monitor/inspect the site until the issues have been addressed.
EV-3122	4/19/19	Mainline/ North Spread/ MPs 57.06 to 57.35 Grady County	Yes	The Compliance Monitor issued a noncompliance report to document a failure to comply with appropriate noxious weeds management procedures. During the previous FERC site visit on Wednesday, April 17, 2019, it was agreed that noxious weed signs would be added to all topsoil piles at this location. The signs were not installed as requested and an operator used a trackhoe bucket to compact a noxious weed-contaminated topsoil pile and then continued to work with clean subsoil using the same contaminated bucket. The Compliance Monitor followed up with the Lead EI and EI, who contacted the environmental team to install signs as soon as possible.



View north of ineffective erosion control devices and sediment on the bridge over waterbody SGR-058B; some of this sediment reached the waterbody below, Mainline, North Spread, milepost 63.38. The Compliance Monitor issued a noncompliance report associated with the issues at this site (see EV-3095 dated April 16, 2019).

**PROBLEM AREA REPORTS**

Problem area reports record an observation where an area or activity does not meet the definition of acceptable but is not considered a noncompliance. Four Problem Area Reports were issued by the Compliance Monitors during this period, as detailed below.

SUMMARY OF PROBLEM AREA REPORTS FOR THE MIDSHIP PROJECT				
Report Number	Date Issued	Location (Spread or Facility/ MP/ County)	Follow-up Required (Yes or No)	Problem Area Description
EV-3003	4/8/19	Mainline / North Spread / MP 50.42 to 52.27 / Grady County	Yes	The Compliance Monitor noted multiple deficiencies including erosion and sediment controls that were inadequately installed or overwhelmed and needed maintenance, repair, or replacement; sediment laden water migrating off the right-of-way and into upland areas; sediment in a waterbody; inadequate topsoil protection; and missing required environmental signage. The Compliance Monitor discussed the observations with the EI and the Lead EI. The EI stated she had issued two noncompliance reports for the inadequate or ineffective erosion and sediment control installation in two locations the previous day, but had not inspected the entire area and so had not noted the off right-of-way sediment and the sediment in the waterbody. The Compliance Monitor scheduled a follow-up inspection of the entire area to ensure all repairs have been completed, sediment has been removed from the waterbody, and off ROW sediment locations have been cleaned up, pending landowner approval.
EV-3027	4/10/19	Mainline / North Spread / MP 61.09 / Grady County	Yes	The Compliance Monitor and the Lead EI discussed an equipment bridge that was impeding the flow of a waterbody and the cut vegetation left in and adjacent to the waterbody that needs to be removed. The Lead EI stated he would address the issues with the contractor and the Compliance Monitor scheduled a follow-up inspection of the waterbody.
EV-3062	4/12/19	Mainline / North Spread / MP 61.09 / Grady County	Yes	The Compliance Monitor conducted a follow-up inspection of the area where problem area report EV-3027 was issued. The bridge was still impeding the flow of the waterbody and the cut vegetation in and adjacent to the waterbody had not been removed. The Compliance Monitor discussed the lack of progress in addressing the issues with the Lead EI. The Lead EI stated he would again address the issues with the contractor and the Compliance Monitor scheduled a second follow-up inspection of the waterbody.
EV-3069	4/13/19	Velma Lateral / North Spread / MP 7.20 to 7.30 / Canadian County	Yes	The Compliance Monitor observed that rock from a rock construction entrance had migrated onto the paved roadway and that no flume pipe had been installed in the bar ditch. The Compliance Monitor and the EI discussed the issues. The EI planned to address the issues with the contractor and the Compliance Monitor scheduled a follow-up inspection of the area.

**NONCOMPLIANCE REPORTS**

Noncompliance reports record an observation where an area or activity that violates (is not in compliance with) the Project specifications, results in damage to resources, or places sensitive resources at unnecessary risk. Seven noncompliance reports were issued by the Compliance Monitors during this period, as detailed below.

SUMMARY OF NONCOMPLIANCE REPORTS FOR THE MIDSHIP PROJECT				
Report Number	Date Issued	Location (Spread or Facility/Milepost [MP]/ County)	Follow-up Required (Yes or No)	Noncompliance Description
EV-3001	4/8/19	Chisholm Lateral I / North Spread / MP 0.53 to 1.19 Kingfisher County	No	The Compliance Monitor noted that the contractor was tracking equipment utilized to strip topsoil from a noxious weed area over the clean subsoil to a wash station to be cleaned. The Compliance Monitor also observed that the crew was cleaning some of the contaminated equipment with some shovels, removing contaminated topsoil from the tracks and blades of the equipment outside of the designated wash area and leaving it on the cleared subsoil area. Additionally, the crew was storing construction materials on the contaminated, segregated topsoil pile. The Compliance Monitor discussed the issues with the EI, who stated that he had suggested that the contractor set up the wash station so that the contaminated equipment did not need to track back over the clean subsoil. The contractor chose not to follow the advice of the EI concerning the placement of the wash station. The Compliance Monitor informed the EI that a noncompliance report would be issued for the multiple inconsistencies with project plans and the FERC Plan observed at the site.
EV-3015	4/9/19	Mainline / North Spread / MP 12.51 to 12.52 Canadian County	Yes	The Compliance Monitor conducted a follow-up of the area where noncompliance report EV-2992 was issued on Saturday April 6 th and noted that some of the defective erosion control devices had not been repaired and that those that were repaired were not properly installed. The Compliance Monitor also observed that sediment had been left on the bridge over one of the waterbodies and additional erosion control devices were damaged and required repair. The Compliance Monitor discussed the issues with the Lead EI and scheduled a follow-up inspection of the area.
EV-3023	4/10/19	Mainline / North Spread / MP 51.14 / Grady County	Yes	The Compliance Monitor conducted a follow-up inspection of the issues documented in Problem Area Report EV-3003 (above) and observed that the upland sediment had not been removed from the waterbody and the required environmental signage had not been replaced. The Compliance Monitor discussed the issue with the EI and scheduled another follow-up inspection of the area.
EV-3024	4/10/19	Mainline / North Spread / MP 51.28 / Grady County	Yes	The Compliance Monitor observed that topsoil was used to build a ramp and stabilize an equipment bridge. The Compliance Monitor discussed the issue with the EI and scheduled a follow-up inspection of the area.



SUMMARY OF NONCOMPLIANCE REPORTS FOR THE MIDSHIP PROJECT

Report Number	Date Issued	Location (Spread or Facility/Milepost [MP]/ County)	Follow-up Required (Yes or No)	Noncompliance Description
EV-3026	4/10/19	Mainline / North Spread / MP 56.29 to 56.40 Grady County	Yes	The Compliance Monitor observed that the required sensitive resource signage was missing from two wetlands. Crews were active in the area. The Compliance Monitor discussed the issue with the Lead EI and scheduled a follow-up inspection of the wetlands. The Lead EI addressed the issue with the contractor.
EV-3028	4/10/19	Mainline / North Spread / MP 79.01 / Garvin County	No	The Compliance Monitor observed several off right-of-way project related vehicles. The Compliance Monitor informed the Lead EI and the EI for the issues. No rutting was observed. The Lead EI addressed the issue with the contractor.
EV-3039	4/11/19	Chisholm Lateral / North Spread / MP 7.63 to 8.13 / Kingfisher County	Yes	The Compliance Monitor observed that no erosion control devices were installed at the end of the workday at two flowing waterbodies. The Compliance Monitor discussed the issuance of the noncompliance with the EI and the Lead EI. The Compliance Monitor scheduled a follow-up inspection of the area.



EV-3001 – View of noxious weed contaminated soil removed from equipment outside of wash station and onto subsoil. Chisholm Lateral, MP 0.53.

**SUMMARY OF COMMUNICATION REPORTS FOR THE MIDSHIP PROJECT**

Report Number	Date Issued	Location (Spread or Facility/ Milepost [MP]/ County)	Follow-up Required (Yes or No)	Description
EV-2984	4/5/19	Mainline / South Spread / MP 173.8 to 174.3/ Bryan County	Yes	<p>The Lead EI, HDD contractor management, and utility inspectors inspected the site of an inadvertent release near the HDD exit workspace at the Blue River crossing. The inadvertent release was discovered on 4/4/19 by the utility inspector at which point reaming and mud pump operations were shut down. The release occurred at multiple locations on an upland slope 50 to 100 feet north of the Project's permanent easement but on the nearby Kinder Morgan pipeline right-of-way. Drilling fluid flowed downslope into a shallow, natural pond. Based on depositional evidence, the release appears to have occurred over several hours and possibly began on 4/3/19. The observed thickness of drilling fluid ranged from less than 1 inch to approximately 12 inches, covering an estimated area of 0.25 acre.</p> <p>The inspection team determined that the least impactful method of access for recovery and cleanup equipment to reach the site is to exit the Project right-of-way near the HDD exit temporary workspace where an existing two track lane extends down the Kinder Morgan pipeline right-of-way. The contractor planned to begin cleanup efforts immediately. The Lead EI indicated landowner approval would be obtained and a variance request for the off-right-of-way activity would be submitted to FERC for approval. The EI staff informed the Compliance Monitor that the incident would be documented as a problem area.</p>
EV-2987	4/6/19	Mainline / North Spread / MP 15.13 to 15.15/ Canadian County	Yes	<p>The Compliance Monitor observed a large amount of rock on the highway near the construction entrance on the southern side of the road. Because of the slope of the construction entrance, rocks are being dragged onto the road surface as construction vehicles exit the right-of-way. The road surface should be cleaned up at the end of each day and possibly throughout the day, if needed, as the highway is heavily travelled and rocks on the road surface pose a safety hazard. The Compliance Monitor relayed these concerns to the EI team.</p>
EV-2991	4/6/19	Mainline / North Spread / MP 18.23 / Canadian County	Yes	<p>After a rain event today, the EI notified the Compliance Monitor that sediment had entered a waterbody on the southern side of the road. The EI requested authorization of foot traffic off right-of-way in order to remove sediment from the waterbody. The Compliance Monitor gave a verbal authorization pending landowner approval. Landowner approval was granted and cleanup activities commenced. The EI will issue a problem area report and a follow up inspection will be conducted.</p>



Midcontinent Supply Header Interstate Pipeline Project, Docket No.: CP17-458-000
 Environmental Compliance Monitoring Program
 March 31 through April 6, 2019 Summary Report

SUMMARY OF COMMUNICATION REPORTS FOR THE MIDSHIP PROJECT

Report Number	Date Issued	Location (Spread or Facility/ Milepost [MP]/ County)	Follow-up Required (Yes or No)	Description
EV-2996	4/6/19	Mainline / South Spread / MP 152.70 / Johnston County	No	<p>The blasting contractor previously requested to perform blasting in waterbodies containing consolidated rock weeks or perhaps months prior to the initiation of the pipeline waterbody crossing construction activities. The FERC staff indicated this activity is allowed provided applicable measures in the FERC Plan and Procedures are followed. The Compliance Monitor discussed the specifics of the applicable measures with the Lead EI and the blasting contractor.</p> <p>The Compliance Monitor observed the right-of-way after explosives blasting was performed in upland areas and waterbodies. No displaced spoil was present in the waterbodies and flow was maintained. ECDs were installed on waterbody banks. Other waterbody banks were not disturbed. No fly rock was observed to be displaced off the right-of-way.</p>

**PROBLEM AREA REPORTS**

Problem area reports record an observation where an area or activity does not meet the definition of acceptable but is not considered a noncompliance. Five Problem Area Reports were issued by the Compliance Monitors during this period, as detailed below.

SUMMARY OF PROBLEM AREA REPORTS FOR THE MIDSHIP PROJECT				
Report Number	Date Issued	Location (Spread or Facility/ MP/ County)	Follow-up Required (Yes or No)	Problem Area Description
EV-2937	4/1/19	Mainline / South Spread / MP 194.80 to 196.30 / Bryan County	Yes	Due to equipment traveling through saturated and inundated soil on the east side of Sulphur Creek, sediment flowed down the timber mat approach toward the bridge. ECDs were overwhelmed, and sediment was deposited in the waterbody. The Compliance Monitor informed the Lead EI and stated that a problem area report would be issued. The Lead EI indicated the contractor would correct the issue.
EV-2941	4/2/19	Mainline / South Spread / MP 154.40 to 155.20 / Johnston County	Yes	After blasting occurred in upland areas and across waterbodies, the Compliance Monitor noted that soil overburden had not been excavated from the waterbody banks, and the resulting displacement caused soil to be deposited in the waterbody. The Compliance Monitor notified the Lead EI and blasting contractor assistant superintendent and stated a problem area report would be issued. The assistant superintendent planned to dispatch a crew to remove the soil from the waterbody. The Compliance Monitor will then conduct a follow-up inspection. The assistant superintendent commented that the waterbody crossing may be initiated next week.
EV-2944	4/2/19	Mainline / South Spread / MP 135.90 to 136.20 / Carter County	Yes	<p>An inadvertent release of drilling fluid occurred at the Washita River HDD crossing at the base of a steep bank on the east side of the river. The HDD superintendent noted that personnel monitoring the river and adjacent areas identified the release upon the loss of drilling fluid circulation. Approximately 200 gallons of drilling fluid flowed onto a sand bar near the water's edge. No visible sign of drilling fluid entering the waterbody was evident. The release occurred approximately 70 feet outside the 50-foot permanent easement and flowed an additional 30 feet prior to being fully contained.</p> <p>Pumping and drilling operations were suspended upon discovery of the release. Crews deployed sand bags and straw bales in the swale effectively containing the release. Pumps then transferred the fluid and seeping high bank water to a vacuum truck parked on a nearby access road.</p> <p>The drilling contractor noted that approximately 360 feet remained to complete the 36-inch ream back to the entry point. The contractor planned to resume reaming at a low drilling fluid pressure once backup pumps are in place. Any additional inadvertent releases would be immediately contained and pumped to a vacuum truck. The contractor operated pumps within secondary containments. The Compliance Contractor and Lead EI conducted observations of the release site.</p>

**SUMMARY OF PROBLEM AREA REPORTS FOR THE MIDSHIP PROJECT**

Report Number	Date Issued	Location (Spread or Facility/ MP/ County)	Follow-up Required (Yes or No)	Problem Area Description
EV-2985	4/6/19	Mainline / North Spread / MP 15.15 to 15.49/ Canadian County	Yes	The Compliance Monitor had previously contacted the Lead EI on 4/1/19 regarding the coating residue left on the ground (Communication Report EV-2935). During a follow-up inspection on 4/6/19, the Compliance Monitor noted the coating residue has not been cleaned up and informed the Lead EI that a problem area report would be issued. The Lead EI responded that he will follow up with the coating inspector.
EV-2989	4/6/19	Mainline / North Spread / MP 1.50 to 1.59 / Canadian County	Yes	The Compliance Monitor noted that the flume pipe on both sides of the road was partially obstructed with rock. Flume pipes should be kept clear of debris at all times. Furthermore, a large rain event is expected later this morning. The Compliance Monitor notified the EI that a problem area report would be issued.



EV-2937 – View of sediment that entered waterbody. South Spread, MP 196.3.

**PROBLEM AREA REPORTS**

Problem area reports record an observation where an area or activity does not meet the definition of acceptable but is not considered a noncompliance. Three problem area reports were issued by the Compliance Monitors during this period, as detailed below.

SUMMARY OF PROBLEM AREA REPORTS FOR THE MIDSHIP PROJECT				
Report Number	Date Issued	Location (Spread or Facility/ MP/ County)	Follow-up Required (Yes or No)	Problem Area Description
EV-2871	3/25/19	Mainline / South Spread / MP 198.60 / Bryan County	No	The Compliance Monitor noted that erosion control devices were not installed at the base of the slope leading to a waterbody, as per project documents, after the slope was graded in preparation for bridge installation across the waterbody. No sediment deposition in the waterbody was observed. The Compliance Monitor and the Lead EI discussed the issue and erosion control devices were subsequently installed.
EV-2880	3/26/19	Mainline / North Spread / MP 17.40 to 17.50/ Canadian County	Yes	The Compliance Monitor conducted a follow-up inspection of a waterbody (originally documented in report EV-2858) and observed that the sediment in the water had been removed and erosion control devices had been installed on the banks of the waterbody. Further sediment removal will be required as upland sediment could still be seen at the bottom of the waterbody. The Compliance Monitor also noted that upland sediment had not been cleaned off the equipment bridge as required. The Compliance Monitor and the Lead EI discussed the issues. Issues with this waterbody are ongoing and have not been resolved.
EV-2884	3/26/19	Mainline / North Spread / MP 0.13 to 0.16/ Kingfisher County	No	The Compliance Monitor and the EI discussed the damaged erosion control devices and off right-of-way sediment. The EI subsequently informed the Compliance Monitor that the damaged erosion control devices had been properly reinstalled. The off right-of-way sediment retrieval will occur once landowner approval has been secured and a variance request has been approved.



NONCOMPLIANCE REPORTS

Noncompliance reports record an observation where an area or activity that violates (is not in compliance with) the Project specifications, results in damage to resources, or places sensitive resources at unnecessary risk. Three noncompliance reports were issued by the Compliance Monitors during this period, as detailed below.

SUMMARY OF NONCOMPLIANCE REPORTS FOR THE MIDSHIP PROJECT				
Report Number	Date Issued	Location (Spread or Facility/ Milepost [MP]/ County)	Follow-up Required (Yes or No)	Noncompliance Description
EV-2873	3/25/19	Mainline / South Spread / MP 191.70 to 192.40 / Bryan County	Yes	The Compliance Monitor conducted a follow-up inspection of the erosion control device deficiencies documented in Problem Area Report EV-2862 and observed that not all the deficiencies had been addressed. The Compliance Monitor and the Lead EI discussed the issues. The Lead EI relayed the information about the deficient erosion control devices to the appropriate contractor representatives. The Compliance Monitor scheduled a follow-up inspection of the area.
EV-2899	3/27/19	Mainline / North Spread / MP 58.35 to 74.92 / Grady County	Yes	The Compliance Monitor observed that felled trees and vegetation had been left in several waterbodies during the tree clearing activities and were impeding the flow of water. The Compliance Monitor discussed the issue with the environmental inspection team. The need to remove the felled vegetation from the waterbodies was relayed to the contractor. The Compliance Monitor scheduled a follow-up inspection of the area.
EV-2912	3/29/19	Mainline / North Spread / MP 57.57 / 59.01 Grady County	No	The Compliance Monitor and the EI had noted that an additional temporary workspace had been staked and cleared within the waterbody buffer (previously documented in communication report EV-2894, above). The issue had been discussed with both the Lead EI and the EI. The Compliance Monitor re-inspected the area and noted that additional clearing activities and erosion control device installation had occurred within the waterbody buffer zone since the prior inspection. The Compliance Monitor, the Lead EI, and two EIs discussed the issue and determined that the need to move the additional temporary workspace away from the waterbody was not communicated to the crew. No survey stakes or flagging to indicate the move of the additional temporary workspace away from the waterbody had been installed. The EI team informed the Compliance Monitor that an environmental stand down would take place for the crew. The senior utility inspector explained the issue to the crew and reiterated the project environmental requirements. The erosion control devices were removed from the waterbody buffer area and the area was restored.

**PROBLEM AREA REPORTS**

Problem area reports record an observation where an area or activity does not meet the definition of acceptable but is not considered a noncompliance. Twelve Problem Area Reports were issued by the Compliance Monitors during this period, as detailed below.

SUMMARY OF PROBLEM AREA REPORTS FOR THE MIDSHIP PROJECT				
Report Number	Date Issued	Location (Spread or Facility/ MP / County)	Follow-up Required (Yes or No)	Problem Area Description
EV-2788	3/18/19	Mainline / North Spread / MP 51.93 / Grady County	Yes	The Compliance Monitor and the Lead EI discussed sediment off the right-of-way and improperly installed erosion and sediment control devices. The off right-of-way sediment had not been previously reported during the after-rain-event field check. The Lead EI subsequently informed the Compliance Monitor that an environmental crew was on site repairing all erosion and sediment controls. The off right-of-way sediment will be retrieved upon receipt of landowner approval and approval of a variance request. The Compliance Monitor conducted a follow-up inspection of the area. The follow-up inspection is documented below in EV-2827.
EV-2801	3/19/19	Mainline / North Spread / MP 15.15 to 15.54 / Canadian County	Yes	The Compliance Monitor observed that vehicles had driven through several of the topsoil piles. The Compliance Monitor and the EI discussed the issue and the EI stated that safety fencing would be installed near the topsoil piles to prevent further loss. The Compliance Monitor scheduled a follow-up inspection of the area.
EV-2806	3/19/19	Mainline / South Spread / MP 135.80 / Carter County	No	The Compliance Monitor was on site when the drilling crew observed an inadvertent release at the Washita River HDD within the river floodplain. Drilling was suspended and the release was contained per the project drilling plan. The release extended a short distance off the right-of-way into the floodplain. The fluid did not reach the waterbody. Contractor crews on foot exited the right-of-way to contain the release prior to it reaching the waterbody. A rubber-tired vehicle was used within the permanent easement to transport materials and equipment to the riverbank for retrieval activities. The contractor mobilized pumps to recover and transfer the release fluid to the HDD exit pit. No off right-of-way soil disturbance was noted from the retrieval activities. The Midship Environmental Coordinator indicated that a variance request would be submitted to document and obtain approval for the off-right-of-way activity.
EV-2814	3/20/19	Mainline / North Spread / MP 7.83 to 8.06 / Canadian County	Yes	The Compliance Monitor observed that contractor crews had been driving and parking on the segregated topsoil piles as well as storing construction debris on the topsoil piles. The Compliance Monitor and the EI discussed the issue and the construction debris was removed from the topsoil piles immediately. The EI stated that safety fencing would be installed around the topsoil piles to prevent vehicles from driving or parking on the topsoil. The Compliance Monitor scheduled a follow-up inspection.



SUMMARY OF PROBLEM AREA REPORTS FOR THE MIDSHIP PROJECT				
Report Number	Date Issued	Location (Spread or Facility/ MP / County)	Follow-up Required (Yes or No)	Problem Area Description
EV-2827	3/21/19	Mainline / North Spread / MP 51.93 / Grady County	Yes	The Compliance Monitor conducted a follow up inspection of the improperly installed erosion control devices documented in Problem Area report EV-2788 and observed that the erosion control devices had been improperly re-installed. The Compliance Monitor informed the Lead EI of the issuance of another Problem Area report for the improper installation of the erosion control devices. The Compliance Monitor scheduled another follow-up inspection of the erosion control devices.
EV-2831	3/21/19	Mainline / South Spread / Durant Contractor Yard / Bryan County	No	The Compliance Monitor and the Lead EI discussed the needed maintenance and repair of the erosion control devices at the Durant Contractor Yard. The Lead EI contacted the contractor environmental crew and the erosion control devices were repaired while the Compliance Monitor was on site.
EV-2836	3/21/19	Mainline / South Spread / MP 155.00 / Johnston County	No	The Compliance Monitor observed a spill on the right-of-way in an upland area. The Compliance Monitor discussed the issue with the Lead EI. The Lead EI contacted the contractor and an environmental crew cleaned up the spill immediately.
EV-2838	3/22/19	Mainline / North Spread / MP 51.93 / Grady County	Yes	The Compliance Monitor and the Lead EI discussed the continued improper installation of erosion control devices (previously documented in EV-2788 and EV-2827) observed during a second follow-up inspection. The Compliance Monitor requested a timeline for the repairs and a detail of the corrective actions as rain was in the forecast. The Lead EI stated that the issues would be added to the contractor punch list to be addressed. The Compliance Monitor scheduled a follow-up inspection of the area.
EV-2840	3/22/19	Mainline / North Spread / MP 49.22 to 49.34 / Grady County	Yes	The Compliance Monitor and the Lead EI discussed the maintenance needed to the erosion control devices. The Lead EI stated the issue would be added to the contractor punch list to be addressed. The Compliance Monitor requested to be notified once the issues with the erosion control devices were addressed as rain was in the immediate forecast. The Compliance Monitor scheduled a follow-up inspection of the area.
EV-2854	3/23/19	Mainline / North Spread / MP 49.22 to 49.34 / Grady County	Yes	The Compliance Monitor conducted a follow-up inspection of the damaged erosion control devices documented in EV-2840 and observed numerous damaged erosion control devices. The Compliance Monitor and the Lead EI discussed the issue and the Lead EI stated that the erosion control devices had been repaired the previous day. The Compliance Monitor had not received notification of the repairs as requested. The Lead EI added the issue to the contractor punch list to be addressed. The Compliance Monitor scheduled a follow-up inspection of the area.



SUMMARY OF PROBLEM AREA REPORTS FOR THE MIDSHIP PROJECT				
Report Number	Date Issued	Location (Spread or Facility/ MP / County)	Follow-up Required (Yes or No)	Problem Area Description
EV-2857	3/23/19	Mainline / North Spread / MP 33.38 to 33.68 / Grady County	Yes	The Compliance Monitor conducted a follow-up inspection of the damaged erosion control devices and the blocked flume pipe originally documented in Communication Report EV-2844 and noted that most of the issues had been addressed, but the flume pipe remained blocked and some of the erosion control devices were improperly installed. A rain event had occurred overnight. No off-right-of-way sediment was noted. The Compliance Monitor discussed the issues with the Lead EI and the EI and scheduled a follow-up inspection.
EV-2862	3/23/19	Mainline / South Spread / MP 191.70 to 192.30 / Bryan County	No	The Compliance Monitor and the Lead EI discussed the missing and improperly installed erosion control devices. The Lead EI discussed the issues with the contractor and subsequently informed the Compliance Monitor that the issues had been addressed.



Problem Area EV-2788 - sediment off the right-of-way due to improperly installed erosion and sediment controls. North Spread, MP 51.93.



NONCOMPLIANCE REPORTS

Noncompliance reports record an observation where an area or activity that violates (is not in compliance with) the Project specifications, results in damage to resources, or places sensitive resources at unnecessary risk. Two Noncompliance reports were issued by the Compliance Monitors during this period, as detailed below.

SUMMARY OF NONCOMPLIANCE REPORTS FOR THE MIDSHIP PROJECT				
Report Number	Date Issued	Location (Spread or Facility/ Milepost [MP]/ County)	Follow-up Required (Yes or No)	Noncompliance Description
EV-2787	3/18/19	Mainline / North Spread / MP 50.88 / Grady County	Yes	The Compliance Monitor observed upland sediment on an equipment bridge and inadequate erosion control devices installed in the vicinity of the waterbody, leaving the waterbody unprotected. The observations were relayed to the environmental inspection team and the Compliance Monitor scheduled a follow-up inspection of the waterbody.
EV-2839	3/22/19	Mainline / North Spread / MP 50.00 to 50.42 / Grady County	No	The Compliance Monitor observed that segregated topsoil piles were not adequately protected. Equipment had driven over portions of the topsoil piles, causing loss of topsoil and mixing of topsoil and subsoil. The Compliance Monitor informed the Lead EI of the observed issue and asked about the planned corrective actions and timeline to address the issue. The Lead EI replied that the issue would be added to the contractor punch list to be addressed. The Compliance Monitor scheduled a follow-up inspection of the area.



Noncompliance Report EV-2787 - Waterbody with missing erosion control devices and erosion control devices installed in the wrong place with sediment on the equipment bridge. North Spread, milepost 50.88

**PROBLEM AREA REPORTS**

Problem area reports record an observation where an area or activity does not meet the definition of acceptable but is not considered a noncompliance. Four problem area reports were issued by the Compliance Monitors during this period, as detailed below.

SUMMARY OF PROBLEM AREA REPORTS FOR THE MIDSHIP PROJECT				
Report Number	Date Issued	Location (Spread or Facility/ MP/ County)	Follow-up Required (Yes or No)	Problem Area Description
EV-2715	3/10/19	Mainline / South Spread / MP 120.60 / Carter County	No	The Compliance Monitor noted that subsoil was placed adjacent to the segregated topsoil in two small areas. The Compliance Monitor and the Lead EI discussed the issue and the Lead EI communicated the issue to the contractor for correction. The Compliance Monitor noted in a follow-up inspection of the area (EV-2765) that the subsoil had been separated from the topsoil.
EV-2729	3/12/19	Mainline / North Spread / MP 49.21 to 49.22/ Grady County	No	The Compliance Monitor observed a large number of project-related vehicles parked on either side of N 2895 Road adjacent to the right-of-way. The vehicles parked off the right-of-way resulted in rutting within the road ditches on either side of the road. The Compliance Monitor, the Lead EI and a contractor representative discussed the issue. The vehicles were moved to the right-of-way and the ruts were smoothed, seeded and mulched. The Lead EI agreed that a noncompliance would be issued for any future incidents of off right-of-way parking.
EV-2732	3/12/19	Mainline / North Spread / Chickasha Yard / Grady County	No	The Compliance Monitor observed equipment tracks that originated within the Chickasha Yard and continued into the adjacent road ditch, outside of the project approved footprint. The Compliance Monitor, the EI, and a contractor representative discussed the issue. The contractor representative verified that a project related piece of equipment had driven from the yard into the road ditch. The EI reiterated the project requirements to stay within the footprint of the project facilities. The impacted area was restored with seed and mulch.
EV-2754	3/14/19	Mainline / North Spread / MP 39.35 / Grady County	No	The Compliance Monitor contacted the EI after observing that tree limbs and other vegetation debris had not been removed from the waterbody banks during the clearing activities. The debris had become trapped under the equipment bridge and within the waterbody and were partially impeding the flow of water. An onsite contractor crew removed the debris and the full flow of water was restored.

**NONCOMPLIANCE REPORTS**

Noncompliance reports record an observation where an area or activity that violates (is not in compliance with) the Project specifications, results in damage to resources, or places sensitive resources at unnecessary risk. Three noncompliance reports were issued by the Compliance Monitors during this period, as detailed below.

SUMMARY OF NONCOMPLIANCE REPORTS FOR THE MIDSHIP PROJECT				
Report Number	Date Issued	Location (Spread or Facility/Milepost [MP]/ County)	Follow-up Required (Yes or No)	Noncompliance Description
EV-2753	3/14/19	Mainline / North Spread / MP 38.90 / Grady County	No	The Compliance Monitor observed that a crew was dewatering the right-of-way through a filter bag and into a roadside ditch. Silt laden water from the dewatering activities was flowing down the ditch and into a waterbody out of compliance with the FERC Plan. The Compliance Monitor and the EI discussed the issue. The EI supervised the installation of straw bales in the road ditch by the contractor's environmental crew. The sediment-laden water flowed around the straw bales and down the ditch to the waterbody. The Compliance Monitor also discussed the issue with the Lead EI. The dewatering activities were suspended.
EV-2760	3/15/19	Mainline / North Spread / MP 50.42 / Grady County	No	The Compliance Monitor observed that the required "no-refueling" signage was missing from a waterbody buffer. It appeared that several pieces of equipment had been parked overnight within the buffer zone of the waterbody. No leaks were noted from the equipment. The Compliance Monitor discussed the issue with the Lead EI. The equipment was moved away from the waterbody buffer zone. The Compliance Monitor noted during a subsequent inspection (EV-2826) that the required signage had been installed at the edge of the buffer zone of the waterbody. Because the lack of required signage has been a recurring issue (most recently reported in EV-2448 and EV-2629) the Compliance Monitor issued a noncompliance report.
EV-2761	3/15/19	Mainline / North Spread / MP 50.24 / Grady County	No	The Compliance Monitor observed the mixing of a large amount of topsoil and with the subsoil piles. The Lead EI and the Compliance Monitor discussed the issue and the Lead EI requested that the crew segregate the piles. The Compliance Monitor scheduled a follow-up inspection of the area. The Compliance Monitor noted in a subsequent inspection (EV-2826) of the area that the subsoil piles had been separated from the topsoil piles.



PROBLEM AREA REPORTS

Problem area reports record an observation where an area or activity does not meet the definition of acceptable but is not considered a noncompliance. One problem area report was issued by the Compliance Monitors during this period, as detailed below.

SUMMARY OF PROBLEM AREA REPORTS FOR THE MIDSHIP PROJECT				
Report Number	Date Issued	Location (Spread or Facility/ MP/ County)	Follow-up Required (Yes or No)	Problem Area Description
EV-2698	3/7/2019	Mainline / South Spread / MP 154.30 to 154.50 / Johnston County	No	The Compliance Monitor noted that a portion (approximately 30 feet wide) of the noise barrier on the west side of the Pennington Creek HDD entry workspace remained open near a noise sensitive area, out of compliance with Project plans. The crew was in the process of assembling a door to close the gap during the inspection. The Compliance Monitor and the Lead EI discussed the issue and the Lead EI communicated the issue to the contractor and requested that drilling activities be suspended until the noise barrier door was installed.





PROBLEM AREA REPORTS

Problem Area reports record an observation where an area or activity does not meet the definition of acceptable but is not considered a noncompliance. Two Problem Area reports were issued by the Compliance Monitors during this period, as detailed below.

SUMMARY OF PROBLEM AREA REPORTS FOR THE MIDSHIP PROJECT				
Report Number	Date Issued	Location (Spread or Facility/ MP/ County)	Follow-up Required (Yes or No)	Problem Area Description
EV-2615	2/28/19	Mainline / South Spread / MP 135.3 / Carter County	No	The Compliance Monitor observed that a small off-right-of-way area (approximately two feet wide by 25 feet long) adjacent the right-of-way was bladed. No sensitive resources were impacted. The Compliance Monitor informed the Lead EI of the incident. The Lead EI addressed the issue with the crew. The area was properly restored. No follow-up inspections are necessary.
EV-2629	3/2/19	Mainline / North Spread / MP 49.05 to 75.42/ Grady County	Yes	The Compliance Monitor noted that the "Project Access Road" signs were missing from several temporary access roads and a temporary access road as mislabeled. The lack of environmental signage could lead to contractor crews utilizing a non-approved access road. This issue has been documented several times and is a recurring issue. The Compliance Monitor and the EI discussed the issue and the EI stated that signage would be added to the temporary access roads where needed. Signage was noted in the area on 3/6/2019, EV-2659.



View of area off right-of-way that was bladed. South Spread, milepost 135.3. The Compliance Monitor issued a problem area report to document the issue.

**NONCOMPLIANCE REPORTS**

Noncompliance reports record an observation where an area or activity that violates (is not in compliance with) the Project specifications, results in damage to resources, or places sensitive resources at unnecessary risk. One Noncompliance report was issued by the Compliance Monitors during this period, as detailed below.

SUMMARY OF NONCOMPLIANCE REPORTS FOR THE MIDSHIP PROJECT				
Report Number	Date Issued	Location (Spread or Facility/ MP/ County)	Follow-up Required (Yes or No)	Noncompliance Description
EV-2595	2/26/19	Mainline / North Spread / MP 69.14 - 69.65 / Canadian County	No	<p>The Compliance Monitor observed that the clearing crew had accessed the right-of-way by crossing a tract that was not part of the project right-of-way from an approved temporary access road. The Compliance Monitor also observed that "No Project Access" signs had been placed along the temporary approved access road used by the clearing crew. In the same area, the Compliance Monitor also noted a "No Refueling" sign for a waterbody posted off right-of-way. The crew installing the environmental signage would have had to trespass and to install the sign. The Compliance Monitor, the Lead EI, the Utility Inspector, and the EI all discussed the off-right-of-way trespass issues.</p> <p>The requirement to stay within the project-approved footprint has been reiterated on a daily basis to all the contractor crews during the morning meetings. Off-right-of-way incidents have been documented several times previously (reports EV-2498, EV-2510, and EV-2542). The requirements of installing the project environmental signage has been communicated numerous times to the environmental inspection team and documented in multiple inspection reports (EV-2427, EV-2499, EV-2524 and EV-2541).</p> <p>The Compliance Monitor asked the Lead EI to inform her of the corrective actions taken to address trespass and environmental signage issues in order to prevent re-occurrence of the same issues in the future. The resolution is documented in EV-2608 above.</p>



PROBLEM AREA REPORTS

Problem area reports record an observation where an area or activity does not meet the definition of acceptable but is not considered a noncompliance. One problem area report was issued by the Compliance Monitors during this period, as detailed below.

SUMMARY OF PROBLEM AREA REPORTS FOR THE MIDSHIP PROJECT				
Report Number	Date Issued	Location (Spread or Facility/Milepost [MP]/ County)	Follow-up Required (Yes or No)	Problem Area Description
EV-2448	2/5/19	Mainline / North Spread / MP 17.48 to 17.50/ Canadian County	No	The Compliance Monitor and the Lead EI discussed the need for adequate environmental signage near wetland WCN-006 and waterbody SCN-101. Environmental signage was installed, but out of view where the crew was working. Silt fencing was installed at both resources. No sensitive resources were damaged as a result of the lack of signage. The Compliance Monitor and the Lead EI have discussed the lack of environmental signage on several occasions. The Compliance Monitor and the Lead EI concurred that in the future, the lack of environmental signs would result in a noncompliance report. The Compliance Monitor completed a follow-up inspection of the area on February 6, 2019 (documented in EV-2450) and observed that additional environmental signage had been installed and was visible from all areas of the site.



Overview of construction activities next to waterbody SCN-101 with no environmental signage visible.



NONCOMPLIANCE REPORTS

Noncompliance reports record an observation where an area or activity that violates (is not in compliance with) the Project specifications, results in damage to resources, or places sensitive resources at unnecessary risk. One noncompliance report was issued by the Compliance Monitors during this period, as detailed below.

SUMMARY OF NONCOMPLIANCE REPORTS FOR THE MIDSHIP PROJECT			
Date Issued	Location (Spread or Facility/Milepost [MP]/ County)	Follow-up Required (Yes or No)	Noncompliance Description
1/30/19	Mainline / North Spread / MP 19.25 to 19.31 / Canadian County	No	The Compliance Monitor observed that grading had occurred within wetland WCN001. The impacted area within the wetland was about 25 feet by 10 feet. Wetland signs, survey stakes, and silt fences were in place along the wetland boundaries at the time of the inspection. The crew informed the Compliance Monitor that topsoil segregation activities commenced in the area on January 29, 2019 prior to wetland signs, survey stakes, and erosion and sediment controls being installed. All topsoiling activities were stopped when the crew realized that they were no longer in an upland area and the survey crew was called in to stake the wetland boundaries. The construction crew removed the upland topsoil from the wetland. The Compliance Monitor and the Lead EI discussed the issue. In order to prevent similar issues at other wetland and waterbody sites, it is imperative that all required signs and right-of-way stakes are in place prior to the start of any construction activities as per the FERC <i>Wetland and Waterbody Construction and Mitigation Procedures</i> .



View of wetland WCN001 after the upland topsoil had been removed.